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ABSTRACT

Senate Resolution 1976-230 directed the Council for Postsecondary Education to undertake a study of the role of the Northwest Association of Schools and Colleges in the certification of postsecondary educational institutions operating in the State of Washington. The accreditation process was reviewed as it relates to: (1) the variety of postsecondary educational enterprises in the state; (2) the desirability of noneducation representatives in the accreditation process; (3) the effectiveness of accreditation as a means to control consumer abuses; and (4) the relationship of accreditation to new and innovative programs. Legal issues regarding state and federal governments, accrediting agencies, and the courts are reviewed in this report. Current issues and recommendations summarized include the following: due process, confidentiality, regionalism, representation, general education requirement, candidate status, transfer of credit, nontraditional institutions, and consumer protection. (LBH)

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Report No. 77-7

REGIONAL ACCREDITATION

A REPORT
IN RESPONSE TO
SR 1976-230

NOVEMBER, 1976

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REGIONAL ACCREDITATION

A REPORT
IN RESPONSE TO
SR 1976-230

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INTRODUCTION

Senate Resolution 1976-230 (Appendix A) directed the Council for Postsecondary Education to "undertake a study of the role of the Northwest Association of Schools and Colleges in the certification of postsecondary educational institutions operating in Washington." The Council was to review the accreditation process as it relates to:

1) the variety of postsecondary educational enterprises operative in the state;

2) the desirability of non-education representatives in the accreditation process;

3) the effectiveness of accreditation as a means to control consumer abuses;

4) the relationship of accreditation to new and innovative programs.

The Council is to report its findings and recommendations on these and related matters to the Senate Committee on Higher Education on or before December 1, 1976.

The study of regional accreditation is an important component of the larger matter of educational licensing/approval legislation, now under consideration by the Senate Research staff (SR-231). The current legislative concern with licensing/approval legislation is based on the perception that the state bears responsibility for the regulation of education and the protection of educational consumers (students, employers, and the public). On the national level the proper division of responsibility in this area between federal authorities, the states, and the private accrediting bodies is a current concern of all parties to the issue. Thus, the study of regional accreditation will have two primary purposes:

1) A statement of what regional accreditation is, how it is accomplished, and what it signifies.

2) A determination for the State of Washington of the proper relationship of accreditation to other forms of educational authorization (existing and under consideration) in the state.

This report presents the historical background of accreditation, describes the process as it relates to the Commission on Colleges of the Northwest Association of Schools and Colleges, and presents a discussion of current issues with recommendations addressing them.

BACKGROUND

In sharp contrast to most European systems of education, which are nationally overseen by centralized ministries of education which exercise direct control over the universities and other units of the system, education in the United States has not been subject to federal regulation. Here institutions of education have been regarded as independent entities, each governed by a board, and within the general range of Constitutional prerogatives reserved to the States. In this regard, the tenth amendment to the Constitution has consistently been interpreted as a proscription against the federal government exercising control over education in any manner approaching the European model.

This freedom for higher education has had mixed results. On the one hand, the almost complete institutional autonomy has lent a remarkable diversity and vitality to American higher education. On the other hand, "...this freedom has also permitted many institutions to offer programs of instruction for which they were ill-prepared in personnel, in financial resources, or in physical facilities. By the end of the nineteenth century the result was a pronounced unevenness in academic quality, with many colleges offering little more than advanced secondary school courses of study, and with the majority of the professional schools operated with attention being given more to the profits for the owners than to education of the students."[1] (Selden, 1965)

Although it seemed apparent in the early 1900's that higher education in the United States was in some need of quality control and standardization, it was unclear who was to perform the task. The general public was not competent to undertake such judgment and the federal government, despite an attempt of the United States Bureau of Education to issue a public classification of colleges during President Taft's administration (and later during the Wilson administration), was limited primarily to issuing reports.

In the states, where both the constitutional and historical responsibility for education lay, the quality and sophistication of local government varied so dramatically that it appeared at that time that the only hope for maintaining standards was through self-regulation.

To meet the social needs for improved education while at the same time protecting high quality colleges and universities from competition from unqualified, or even dishonest institutions, associations of the colleges and agencies of the professions initiated the process of accreditation.

Accreditation has been defined as:

> ...the process by which an agency organization evaluates and recognizes a program of study or an institution as meeting certain predetermined qualification or standards. It shall apply only to institutions and their programs of study or their services.[2] (Selden, 1971)

Although conditions in education in the 1870's, 1880's, and 1890's were basically the same throughout the country, there was sufficient regional variation that different approaches were developed to meet two general problems: standardization and college admissions.

Initially, a primary focus of the accreditation process was to improve communications between secondary schools and colleges, in an attempt to more carefully monitor the quality of higher learning. Subsequently, however, that issue has faded and presently accrediting agencies claim to be focusing on two major concerns:

> Educational quality, defined and interpreted within the context of the institution or program's statement of its own scope and purpose and compared with similar institutions and programs; and
>
> Institutional integrity, that the institution or program is what it says it is and does what it says it does, at a given point in time.[3] (COPA, 1975)

It is further claimed that the accreditation process concerns itself with and promotes institutional self-study and peer evaluation.[4] (COPA, 1975)

Since their inception in the late 1800's, voluntary, nongovernmental, extralegal accrediting organizations have grown in number and influence.[5] Aside from state governmental accreditation which, in general, lacks overall coordination*, there are two types of accrediting agencies.

First, there are six regional associations of colleges and schools, each responsible through parallel commissions for accreditation of secondary schools and postsecondary institutions. The latter include universities, four-year colleges, junior colleges, and separate specialized colleges such as theological schools and technical institutes.

The second type of accrediting agency is called "professional" and is national (as opposed to regional) in operation. These agencies accredit programs (as opposed to institutions) in such fields as chemistry, dentistry, engineering, law, medicine, theology, and other professional programs (e.g., the ABA, AMA, SPE, and ADA).

In 1975, the Council on Postsecondary Accreditation (COPA) grew out of the fusion of the former Federation of Regional Accrediting Commissions of Higher Education (FRACHE) with the former National Commission on Accrediting (NCA). A national organization created to help coordinate nongovernmental accrediting activities, COPA has been said to be in the business of accrediting accrediting agencies. COPA recognizes nine postsecondary accrediting commissions of the six regional associations. These nine commissions evaluate and accredit approximately 2,400 colleges and universities in the United States. In addition, COPA recognizes 36 specialized or programmatic (professional) accrediting groups that accredit approximately 3,600 programs in 48 disciplines or areas of postsecondary education.[6] (COPA, Balance Wheel)

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*New York Board of Regents is the exception.

The 36 members of the COPA's board include 12 members designated by the regional commissions, eight by higher education associations, eight by agencies accrediting specialized schools and programs (including three accrediting proprietary schools), two by the Education Commission of the States, one by the Commissioner of Education, and five "public" members designated by the board itself.[7] (Orlans, 1975)

NORTHWEST ASSOCIATION

The Northwest Association of Secondary and Higher Schools formally came into existence on April 5, 1917. The initial purpose of the Association, as stated in the original constitution, was "...to foster close cooperation between the secondary and higher schools of the Northwest, in the promotion of both their individual and common interests."[8] (Stetson, 1971)

At that time, the Association's membership consisted of 25 secondary schools, eight higher institutions and nine individuals in the four Northwest states (Idaho, Montana, Oregon and Washington).

Today, both the purposes and the membership of the Association have changed substantially. The purposes of the organization as stated in the present constitution are:

1) To advance the cause of education in the colleges and schools of the Northwest (i.e. within the states of Alaska, Idaho, Montana Nevada, Oregon, Utah and Washington) by taking over and carrying on, in corporate form, the existing organization, activities, purposes, assets and liabilities of The Northwest Association of Secondary and Higher Schools, an unincorporated association, as formerly constituted.

2) To develop educational policies and activities which will extend and improve educational opportunities and service.

3) To develop criteria of evaluation which shall continuously stimulate, evaluate and accredit vital educational effort.

4) To promote cooperative relationships among colleges and schools in order to attain these ends.

5) To do all things convenient, necessary and proper to accomplish its purposes, as set forth in this Article.[9] (NASC Constitution, 1974)

Accrediting was barely mentioned in the first constitution, but it was apparently recognized that accreditation would be a major activity by the Association and an important means of promoting cooperation in school improvement.

At present, the Northwest Association accredits schools and colleges in seven states - Alaska, Idaho, Montana, Nevada, Oregon, Utah and Washington. As of January 1, 1976, there were 122 accredited postsecondary institutions and 15 candidates* (including two of Washington's Vocational-Technical Institutes, see Appendix B) and 801 schools accredited by the Commission on Schools.

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*For discussion of candidacy, see p. 10.

A 1970 comparison of the six regional associations gives several measures of relative size that are probably still applicable. As shown in Table I, there is great variation in the size of the six regions. In terms of political subdivisions served, the smallest is the Western with two states (California and Hawaii) and one territory (Guam); the largest is North Central with 19 states.

In terms of affiliated institutions of higher learning within its boundaries, the smallest as of July 1, 1970, is the Northwest with 115; the largest is North Central with 697.

In terms of square miles of United States territory, the smallest is New England with 66,000; the largest is North Central with 1,350,000.

In terms of population, the smallest is Northwest with approximately 8,400,000 (from 1969 estimated population figures); the largest is North Central with approximately 67,300,000.[10] (Puffer, 1970)

The same source compares the records of the regional commissions on actions regarding evaluation team recommendations (Table 2). The distribution of examining team reports reviewed among the six regions shows that of the total of 950 in the years reviewed, North Central had much the largest number (323 or 34% of the total load) and Northwest the smallest (69 or 7% of the total load). On a commission basis (rather than regional) the Accrediting Commission for Junior Colleges in the Western Region had the smallest load (61 or 6% of the total).

In terms of the denial of initial accreditation, the Middle States commission led the group of seven commissions with nine percent, with the Accrediting Commission for Junior Colleges the lowest with none. The average for all commissions was four per cent.

In terms of denial of reaccreditation, the Southern commission was highest with six percent, with four other commissions reporting none. The average for all commissions was two per cent.

Some additional evidence appears in line four of the table. Here Northwest leads with twenty-three percent of its institutions being put on notice for serious deficiencies, with New England taking no such action at all. On the average, eight per cent of the institutions received such treatment. It might also be noted that the Accrediting Commission for Junior Colleges in the Western region, which denied no initial accreditations or reaccreditations, gave serious warnings to eighteen per cent of the institutions reviewed.

TABLE I

SIZE OF REGIONAL ASSOCIATIONS - July 1, 1970

NAME OF ASSOCIATION	States	Square Miles	Population(a)	Affiliated Institutions	
Middle States Association of Colleges and Secondary Schools	5(b)	119,600	45,000,000	Accredited Members	353
				R. C. A's(c)	54
				Correspondents	17
				Total.......	424
New England Association of Colleges & Secondary Schools	6	66,600	11,500,000	Accredited Members	150
				R. C. A's	32
				Correspondents	5
				Total.......	187
North Central Association of Colleges & Secondary Schools	19(d)	1,350,000	67,300,000	Accredited Members	570
				R.C. A's	51
				Correspondents	76
				Total.......	697
Northwest Association of Secondary & Higher Schools	7	1,177,700	8,400,000	Accredited Members	97
				R. C. A's	14
				Correspondents	4
				Total.......	115
Southern Association of Colleges & Schools	11(e)	739,700	51,100,000	Accredited Members	517
				R. C. A's	14
				Correspondents	81
				Total.......	612
Western Association of Schools & Colleges	2(f)	165,300	20,500,000	Accredited Members	194
				R. C. A's	12
				Correspondents	12
				Total.......	218

(a) 1969 estimated population figures
(b) Also the District of Columbia, Panama Canal Zone, Puerto Rico, Virgin Islands and one institution in France
(c) R. C. A. is a Recognized Candidate for Accreditation
(d) Also one institution in France
(e) Also two institutions in Mexico
(f) Also the Territory of Guam

SOURCE: Clyde E. Puffer, Regional Accreditation of Institutions of Higher Education, FRACHE, 1970, p. 138.

TABLE II

Commission Action (or Executive Board Action)

On Examining Team Recommendations

1966-67 to 1968-69
number and (percent)

						Western		
	M.S.	N.E.	N.C.	N.W.	S.	ACJC	ACSCU	TOTAL
1. Number of Examining Team reports reviewed during period 1966-67 to 1968-69	128 (100)	80 (100)	323 (100)	69 (100)	212 (100	61 100	77 100)	950 (100)
2. Number of Institutions denied initial accreditation	11 (9)	3 (4)	8 (2)	2 (3)	16 (8)	0 (0)	2 (3)	42 (4)
3. Number of institutions denied reaccreditation	0 (0)	0 (0)	3 (1)	1 (1)	13 (6)	0 (0)	0 (0)	17 (2)
4. Number of institutions warned, placed on probation or otherwise put on notice for serious deficiencies	5 (4)	0 (0)	30 (9)	16 (23)	11 (5)	11 (18	3 (4)	76 (8)
5. Number of Examining Team recommendations accepted without change by the Commission*	113 (88)	68 (85)	186 (58)	57 (83)	203 (96)	51 (84	65 (84)	743 (78)
6. Number of Examining Team recommendations changed by the Commission which could be considered more favorable to the institution *	2 (2)	3 (4)	36 (11)	5 (7)	9 (4)	4 (7)	7 (9)	66 (7)
7. Number of Examining Team recommendations changed by the Commission which could be considered less favorable to the institution *	13 (10)	9 (11)	91 (28)	7 (10	0 (0)	6 (10	5 (6)	131 (14)
8. Number of institutions that appealed a Commission action	0 (0)	0 (0)	6 (2)	0 (0)	0 (0)	0 (0)	0 (0)	6 (1)

M.S.- Middle States Association of Colleges and Secondary Schools
N.E.- New England Association of Colleges and Secondary Schools
N.C.- North Central Association of Colleges and Secondary Schools
N.W.- Northwest Association of Secondary and Higher Schools
S. - Southern Association of Colleges and Schools
Western - Western Association of Schools and Colleges:
ACJC is Accrediting Commission for Junior Colleges
ACSCU is Accrediting Commission for Senior Colleges and Universities
*For North Central and Southern the actions apply to the Executive Board and the Standing Committee respectively rather than to the Commission.

Source. Clyde E. Puffer, Regional Accreditation of Institutions of Higher Education, FRACHE, 1970, p. 243-44.

From Table 2 it may be concluded that there are notable differences in the decision-making among the seven commissions and six regions. Some have fewer denials and more warnings; some the opposite. Moreover, the percentages undoubtedly change from year to year as a different mix of institutions comes along. But it can be pointed out that on a nation-wide basis and during the years under review, six percent of the institutions reviewed failed to be added to or to remain on the accredited list.

Lines six and seven of Table 2 show the direction of the modifications in team recommendations made by the seven commissions. Only two of the seven commissions made evaluation team recommendations more favorable a greater number of times than they made them less favorable; these were the Southern and the Accrediting Commission for Senior Colleges and Universities in the Western Region. The tables show that Southern made none of the team recommendations less favorable to the institution.

Of the five commissions that ruled less favorable than team recommendations more often than they ruled more favorable, North Central leads the list with twenty-eight percent, which is double that of the next highest - Middle States - and almost triple that of New England, Northwest, and Accrediting Commission for Junior Colleges of Western.*

Like the other regional accrediting agencies, the Northwest Association retains two internal "commissions", the Commission on Schools and the Commission on Colleges.** The concern here is with the Commission on Colleges.

This Commission consists of twenty-three members plus a chairman and executive director who are ex-officio. All the elected commissioners serve on a three year voluntary (without compensation) basis. The commission is scheduled to meet only twice a year, while its day-to-day administrative tasks are performed by the executive director, who serves at the pleasure of the commission.

Institutional accreditation at the postsecondary level is a means used by regional accrediting commissions for purposes of:

1) fostering excellence in postsecondary education through the development of criteria and guidelines for assessing educational effectiveness;

2) encouraging institutional improvement of educational endeavors through continuous self-study and evaluation;

3) assuring the educational community, the general public, and other agencies or organizations that an institution has clearly defined and appropriate educational objectives, has established conditions

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*The foregoing discussion of Table 2 is a verbatim recitation of elements from the analysis in the source.

**The Western Association maintains three commissions with separate commission for junior/community colleges and for senior institutions.

under which their achievement can reasonably be expected, appears in fact to be accomplishing them substantially, and is so organized, staffed, and supported that it can be expected to continue to do so;

4) providing counsel and assistance to established and developing institutions;

5) protecting institutions against encroachments which might jeopardize their educational effectiveness or academic freedom.[11] (NASC, 1975)

Traditionally, the Commission has considered for accreditation non-profit public and independent baccalaureate institutions and community colleges. In 1974 in answer to the question, "Are for-profit or proprietary programs or schools now eligible for accreditation", the Northwest Commission replied, "Yes, in certain circumstances." However, to date, no such institution is accredited by Northwest.* One proprietary institution in Oregon recently made application for candidate status and an evaluation visit was made in October, 1976.

There are several stages through which an institution must pass before it acquires accreditation status. First, it must gain initial recognition as a Candidate for Accreditation. Applicants for candidacy may or may not be fully operative. "While candidacy does not assure accreditation, it is a status of affiliation which indicates that an institution has achieved initial recognition and is progressing toward accreditation... the institution must provide evidence of sound planning, the resources to implement these plans, and appear to have the potential for attaining its goals within a reasonable time."[12] (NASC, 1975) (emphasis added)

To be considered for Candidate for Accreditation status the applicant organization must be a postsecondary educational institution with the following characteristics:

1) Have a charter and/or formal authority from the appropriate governmental agency to award a certificate, diploma or degree.

2) Have a governing board which includes representation reflecting the public interest.

3) Have employed a chief administrative officer.

4) Offer, or plan to offer, one or more educational programs of at least one academic year in length or the equivalent at the post-secondary level, with clearly defined and published educational objectives as well as a clear statement of its means for achieving them.

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*Orlans, 1973.

5) Include general education at the postsecondary level as a prerequisite to or an essential element in its principal educational program.

6) Have admission policies compatible with its stated objectives.

7) Have developed a preliminary survey or evidence of basic planning for the development of the institution.

8) Have established an adequate financial base of funding commitments and have available a summary of its latest audited financial statement.

The institution prepares a self-study. This analysis should show how well the institution is organized, staffed and supported to accomplish the purposes it seeks to serve. When completed, five copies of the self-study report together with supporting documents, a letter requesting an evaluation, and a $50 filing fee are mailed to the executive director. If the report indicates that an institution is eligible and ready for a candidate visit, an evaluation by a committee of two or more persons is scheduled. The charge for the evaluation is $225 per evaluator.[13] (NASC, 1975)

On the basis of the evaluation team's report to the Commission on Colleges, a decision is made at the summer or annual meeting concerning the candidacy status of the institution. If candidacy is granted, in the Commission's view:

1) the institution's organization, structure, and staffing are acceptable for its stage of development,

2) its sponsors are committed to supplying its needs and are able to do so,

3) its governing board is functioning properly, and

4) its instructional programs and financial plans are well designed.[14]

Institutions recognized as Candidates for Accreditation are required to:

1) File an annual report with the Commission office. This annual report should contain:

   a. current statistical information;

   b. developments in the areas of concern previously noted by the Commission or its representatives;

   c. commentary on new programs, future plans, and other developments bearing on its educational effectiveness.

2) Have an on-site visit every two years. The evaluation team prepares a report for the institution to be considered by the Commission.

Consultants are available to assist institutions as they progress toward regional accreditation.

Candidate for Accreditation status is limited to a maximum of six (6) years, provided that the annual institutional reports and the biennial evaluation reports indicate that the institution is progressing satisfactorily toward regional accreditation. The Commission reserves the right to remove an institution from the list of Candidates for Accreditation after due notice.

A Candidate for Accreditation may apply for accreditation at any time within the six (6) year period after consultation with the Commission. If an institution does not achieve accreditation within the six (6) year period, it will be dropped from the list of Candidates for Accreditation and must wait two (2) years before reapplying for said status or applying for accreditation.[15]

Accreditation (as distinguished from candidacy) is a status which indicates that an institution is offering its students on a satisfactory level the educational opportunities implied in its objectives. To be considered for accreditation the applicant organization must be a postsecondary educational institution with the following characteristics:

1) Have a charter and/or formal authority from the appropriate governmental agency to award a certificate, diploma or degree.

2) Have a governing board which includes representation reflecting the public interest.

3) Offer one or more educational programs of at least one academic year in length or the equivalent at the postsecondary level, with clearly defined and published educational objectives as well as a clear statement of its means for achieving them.

4) Include general education at the postsecondary level as a prerequisite to or an essential element in its principal educational programs.

5) Have admission policies compatible with its stated objectives.

6) Publish and make available to the public a summary of its latest audited financial statement which indicates fiscal resources adequate to support its offerings.

7) Have completed a major portion of at least one cycle of its principal programs prior to an on-site evaluation.

8) Submit an institutional self-study.[16] (NASC, 1975)

The evaluation process periodically and jointly conducted by the institution and the Commission may take a number of forms, but regardless of the particular form employed, it includes the following steps:

1) The institution analyzes itself through a self-study.

2) Professional colleagues from other campuses study the institutional analysis report, visit the campus as an evaluation committee, and prepare a written team report.

3) The president of the institution is given an opportunity to respond to the evaluation committee's written report before the final draft is prepared.

4) The Commission on Colleges reviews the institutional self-study, the evaluation committee's written report, interviews the evaluation committee chairman and the president of the institution, and takes action on the basis of information gained.

5) The institution continues to consider and act on the results of its own self-study and the advice received.[17] (NASC, 1975)

Members of an evaluation committee function as friendly consultants as well as critics. The purpose is to produce a committee report which will be useful to the institution and to the Commission which must make a decision on accreditation.

A Northwest evaluation committee usually has five to fifteen members, the number depending on the nature of the institution and its programs. Every principal instructional area must be examined. The evaluators are assigned from accredited higher institutions of the Northwest and possibly other regions. Some of the evaluators come from institutions like the one to be visited. A majority of the members are from outside the state of the college to be evaluated.

The committee chairman is assigned by the Commission more than a year prior to the evaluation. He is normally a present or former member of the Commission. Committee members are assigned through the office of the executive director. The institution is provided a roster of the committee at least one month prior to the date of the evaluation.

Committee evaluation dates are arranged by the office of the executive director through the institutional presidents, normally two years or more in advance, and are confirmed by the Commission. A concerted effort is made to arrange dates most suitable to the institution; however, compromises are sometimes necessary. Two or more evaluations are not usually scheduled concurrently. Also, the dates must allow sufficient time for the committee report to be prepared for the summer or annual meeting of the Commission in late June and early December. Evaluations in May and November will usually have to be considered by the Commission in December and June, respectively.

At the conclusion of the (usually three-day) on-campus evaluation, each evaluator provides the committee chairman with a report for his or her area of responsibility. The report follows the outline of the institution's self-study. The committee chairman is responsible for editing the individual reports and publishing a confidential committee report for the Commission. When the chairman finishes the first draft of the committee report he sends a copy to the chief administrator of the institution for factual correction and whatever other suggestions he cares to make. The committee chairman, of course, has final authority for the content of the report.

Prior to the summer or annual meeting, depending on the time of the evaluation, the report is duplicated and distributed to the chief administrator, to committee members, and to members of the Commission. The report does not contain a recommendation on accreditation. This confidential recommendation is made by the committee chairman when he appears before the Commission.

The committee report is considered confidential. No outsider is given access to it through the committee members, the Commission, or the office of the executive director. The chief administrator of the institution is provided with twenty-five to fifty copies of the report. It is expected that he will make wide internal circulation of the report.[18] (NASC, 1975)

The chief administrator is given an opportunity to react to the report when he appears before the Commission.

Possible Commission actions include:

Accreditation of New Members. New members are not accredited for a specific number of years. Normally, a new member is to conduct a self-study and be re-evaluated by a full committee during the fifth year after initial accreditation, and is to submit a progress report during the third year. If, in the Commission's judgment, a new institution is not ready for membership, it might defer a decision for a year or two pending further reports on specific matters or a visit by a small committee, or both, or it might deny accreditation for the present.

Reaffirmation of Accreditation. Continuing members are not accredited permanently or for a definite number of years. Accreditation must be reaffirmed periodically. Every institution is to conduct a self-study and be visited by a full evaluation committee every ten years; every five years each institution is to prepare an interim report and be visited by one or more representatives of the Commission. At the time of reaffirmation, the Commission may request an institution to submit additional reports at specified times or to receive a visit from a small committee or both. If the Commission believes it must do so, it may recommend revocation of membership to the delegate assembly of the Association.

Emergency Circumstances. In situations of crisis, when the Commission judges that an institution is in real danger of being unable to fulfill its purposes, the Commission reserves the right to request that an institution receive an evaluation committee. If, in such a case, an institution should refuse the request, it will be asked to show cause why the Commission should not recommend revocation of its membership.[19] (NASC, 1975)

Requests for reconsideration of decisions by a Commission or the Association must be filed with the President of the Association within thirty (30) days following the meeting at which the decisions were made and must represent official action of the governing bodies of the institutions concerned. The basis for such requests for reconsideration must be alleged bias, injustice, departure from established procedures, or factual error of sufficient magnitude to warrant reconsideration of the decision. The allegations must be supported by a short and plain statement of the specific grounds upon which reconsideration is requested, with the reasons for each such grounds, and any other relevant statements or documents which the applicant desires to include in its request.

In handling properly filed requests for reconsideration of decisions, the President of the Association either appoints a special Board of Review or remands the controversy to the appropriate Commission or Association (Board of Trustees) for further consideration. Any judgment thus rendered is final.

A special Board of Review appointed by the President of the Association consists of five (5) members. Where the appeal is from a post-secondary institution, at least three (3) members of the Board of Review must be from the field of higher education. Where the appeal is from a secondary school, at least three (3) of the members must be from the field of secondary education. No member of the Board of Review may be a current member of a Commission, or the Board of Trustees of the Association, nor shall have served on evaluation teams to the institution being reconsidered. The Board of Review so appointed elects its own Chairman and acts by at least a majority of its members.

In carrying out its duties, the Board of Review:

1) sets the date, time, and place of the meeting to consider an appeal at least twenty (20) days in advance and so notifies the parties concerned in writing;

2) provides for a hearing of the applicant if so requested in the appeal;

3) considers the allegations of bias, injustice, departure from established procedure, or factual error of sufficient magnitude to warrant reconsideration;

4) studies the evidence submitted in writing by the institution in support of its allegations;

5) considers the report of the evaluating team, the institution's response, and other supporting statements and documents;

6) compares the stated policies and procedures of the Commission and Association with the procedures followed in considering the institution;

7) prepares a report of the meeting of the Board of Review, including a final judgment of the Board, within ten (10) days after the end of the meeting;

8) forwards the record to the President of the Association, including a report of the meeting of the Board of Review, the appeal filed by the applicant, and other relevant statements and documents considered by the Board.

If the request for reconsideration includes a request for a hearing, the Board of Review and applicant may be advised and represented by such persons as each may choose. Only one representative may speak for the applicant. The course of the hearing is controlled by the Chairman of the Board of Review. The Chairman may limit the testimony of witnesses. Reasonable questioning or cross-examination of a witness may be afforded the applicant, and the members of the Board of Review may ask such questions as they deem relevant. Unless otherwise ordered by the Board of Review, hearings last no more than one day.

The decision of the Board of Review at the conclusion of its meeting either sustains the decision of the Commission or Association, grants the application of the institution, or remands the case to the appropriate Commission with instructions for an institutional self-study and committee re-evaluation. In case of the latter decision, the status of the applicant is continued until the re-evaluation has been completed and a decision reached through prescribed procedures.

When deemed appropriate, the President of the Association remands the controversy to the appropriate Commission or Association (Board of Trustees) for further consideration. In carrying out its review responsibility, the Commission or Association (Board of Trustees) follows the same procedures as outlined above for a special Board of Review.

LEGAL ISSUES

When the American method for controlling quality in education was conceived, the issues were fundamentally simple and clear cut--the academic community needed to protect itself from competition from unqualified and even dishonest educational institutions. The future of education for decades to come was one of massive expansion and growth, and educators wanted to assure the American public (and European educational institutions as well) that they could provide high quality education with minimal regulation.

The literature on the subject of accreditation is generally supportive of the retention and in some cases strengthening of regional and professional accreditation. Though most commentators on the subject are educators themselves and thus not totally without interest in the issue, many non-institutional writers warn against "undue" interference from state and federal governments. The fundamental rationale for these warnings is the fear that such interference would jeopardize the local control traditionally granted to educational institutions.

Between 1885, when the first private accrediting agency was established, and today, "...the educational enterprise moved from the periphery to the center of national consciousness and in the process some of the fundamental assumptions and methods of operations have been shaken to the core."[20] (Boyer, 1973)

Education has become the largest industry in America.[21] The growth in the cost, size and complexity of the educational enterprise, has led many thoughtful observers to re-evaluate traditional governing structures. The issue of accreditation is a crucial one for, as William Selden asserts, "In the United States, accreditation is the primary method by which higher education provides its own self-governance."

Concerns about accreditation appear to be centered around what future roles several key actors will play in the accreditation process. These actors are the federal government, state government, accrediting agencies and, more recently, the courts.

Federal Government

Constitutionally, education is a state responsibility, and, therefore, the federal role has traditionally been limited. What part the federal government does play in educational policy stems from its funding powers. The development of any national policy toward education has generally been discouraged by the public, and more specifically, by the academic community itself.

There is no federal agency which has the power to directly regulate accrediting agencies. However, some indirect regulatory power has been obtained through provisions in federal aid-to-education statutes. And more recently, federal antitrust laws pose the potential of additional indirect regulatory power.[22] (Kaplin and Hunter, 1966)

The federal government has expressed its concern with accreditation by "purse string controls" extended to the Office of Education. Currently, the Commissioner of Education has two major methods of indirectly regulating accrediting agencies.

First, the Veteran's Readjustment Assistance Act of 1952 authorized the Commissioner to "...publish a list of nationally recognized accrediting agencies and associations which are determined to be reliable authority as to the quality of training offered by an educational institution...." Criteria and procedures for recognizing accrediting agencies are published in the Federal Register. Since grants of federal funds usually depend in part upon the accredited status of the institution, and since the law states that accreditation must come from an agency recognized by the Commissioner, that recognition is important to the associations and the Commissioner's power over them could be significant.

Second, the Commissioner does have limited power directly to recognize schools for purposes of federal aid eligibility. Although to date, the federal government has hesitated to engage in rating schools*, this is changing. The Commissioner does have the power to set standards if there is no recognized agency to accredit schools in a particular category. Further, if an applicant for federal aid is not accredited but there is a recognized agency in the field, the Commissioner can deem it accredited for purposes of federal grants if it is determined that there is "satisfactory assurance" that a school will meet the agency's accreditation standards "within a reasonable time." [23] (Kaplin and Hunter, 1966)

The relationship between the accrediting agencies and the federal government has been, as a rule, cooperative. Despite some conflict resulting from the HEW report on accrediting (the Newman Task Force), which harshly criticized reliability of regional and professional accrediting groups, the federal government and the Office of Education rely heavily on private accrediting agencies. The federal statutes explicitly make accreditation by private agencies a foremost standard in identifying schools eligible for federal grants. Even when the Commissioner deems a school to be accredited by virtue of satisfactory progress, the standards of the accrediting body, not those of the Commissioner, provide the measure of progress. And in many instances, statutes explicitly require that an institution shall be deemed accredited only "after consultation with the appropriate accreditation body or bodies."

In general, "it appears that the power to recognize Accreditation, bestowed on the Commissioner by virtue of these statutes, was not intended to be used as a regulatory device, but rather as a necessary aspect of the implementation of federal programs." [24] (Kaplin and Hunter, 1966)

State Government

The literature on educational accreditation has not, as a rule, concentrated on the state's role in the accreditation process. Generally, the literature attempts to dismiss increased state government activity on several grounds:

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*There was an attempt by the Office of Education in the early 1900's to release a list of classified colleges. President Taft, and later President Wilson, refused to release the list.

--fifty states mean many diverse standards, it would be "unfair" to require schools in one state to meet standards from which schools in another state are exempt.

--since states, like federal officials, dare not draw quality distinctions among educational institutions, lists of eligible institutions would be coterminous with the number legally authorized to operate in the state.

--since state governments already fix budgets, coordinate programs, and have other controls, further involvement would mean "excess power."

--government agencies would "go by the book" and impose common rules regardless of the nature and circumstances of individual schools.[25] (Orlans, 1975)

Despite these and other criticisms and arguments for keeping state government out of the accreditation process, the state's interest in accreditation cannot be ignored.

Like the federal government, state governments have come to rely heavily on the accreditation status of an institution in determining eligibility for public funds. While most public institutions of higher education are eligible for some state funds whether they are accredited or not,[26] the state is dependent upon the accreditation process for numerous other purposes. In the State of Washington, students to be eligible for certain financial aid programs must attend a "...public or private college, university or community college in the State of Washington which is accredited by the Northwest Association of Secondary and Higher Schools, or any public vocational-technical institute in the State of Washington." (RCW 28B.10.802)

Dependence on accreditation (institutional and specialized) is not limited to legislation directly linked to education. There are statutes relating to the qualifications of the Director of Highways,[27] supervision of practical nurse education,[28] and numerous statutes referring to qualifications for state licensure in such areas as nursing homes[29] and pharmacy.[30]

Thus, as with the federal government, state governments depend a great deal upon accreditation. While the future role of the state in accreditation is undetermined, it should be pointed out that the states appear to have three primary methods of controlling, if they choose, accreditation activities carried on within their borders:

--indirect regulation through competition--the establishment of state (public) accrediting agencies,*

--direct regulation through legislation specifically aimed at private accrediting agencies,**

--regulation through use of statutes applicable to corporations and associations in general.***[31] (Kaplin and Hunter, 1966)

Congress' delegation to private associations of the authority indirectly to control participation in federal programs and access to federal funds has been questioned.

> The delegation of legislative power to private associations without regard to statutory standards raises serious questions both of constitutionality and public policy. In Schecter Poultry Corp. vs. United States (295 U.S. 495) the Supreme Court held title I of the National Industrial Recovery Act to be unconstitutional because it delegated legislative power to the President 'without standard or rule, to be dealt with as he pleased.' In a concurring opinion, Justice Cardozo characterized the delegated power as 'unconfined and vagrant.'
>
> Congress clearly has not prescribed a standard or test to guide and control recognized accrediting agencies in the exercise of their discretion. The statutes employ the term accreditation as if it had a precise, commonly understood meaning. The prescribed standards apply only to the recognition of accrediting agencies, not to standards of accreditation. Each association has been left with unrestricted authority to prescribe standards. These differ from one association to another and may be remotely related to the statutory objective of 'assuring the quality of training.'[32] (Orlans, 1975)

To the degree that the state has made participation (e.g., in student aid programs and professional licensing) contingent upon "accreditation" the same question of delegation applies.

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*At present, New York is the only state which has instituted comprehensive regulation of educational quality (dating from 1784).

**The extent to which this can be done depends upon the public status of the agencies, see p. 23.

***The Northwest Association of Schools and Colleges is incorporated as a Washington corporation.

Accrediting Agencies

Although accrediting agencies have greatly increased in importance in recent years, their legal position remains ambiguous. Such ambiguity poses several potentital problems for the future of accreditation as it is preently structured.

The educational accrediting agencies are private, nonprofit, voluntary associations. However, although they occupy a loosely defined legal category which covers voluntary organizations in general, these agencies appear to have certain characteristics beyond the scope of general association law, and that law is too broad to be determinative of the extent to which accrediting agencies can be supervised by the courts.[33] While most educational accrediting agencies are incorporated, which helps clarify their legal status, there are many unresolved legal issues.

There are several considerations to take into account when discussing the future role of accrediting agencies. First, because of the public concern for consumer protection and reliance upon accreditation, accrediting agencies have come to be regarded as quasi-public in their functions.[34] Thus, although the autonomy of these agencies has been respected in the past, the public service functions they have assumed may dispose the courts to interfere in their affairs where they would not with those of other private associations.

Second, society has come to rely on accreditation as a means of judging the quality of education. Employers, schools, and especially state licensing authorities now depend heavily upon accreditation. Accrediting agencies, by providing lists of approved schools, assume the state-delegated function of formulating licensing standards. Because of the public reliance, and because of policies and actions of national accrediting associations--which have reduced the number of accrediting agencies so that normally only one agency is recognized in each region or profession--accreditation is akin to monopoly power. Thus, the accrediting agency is not truly a "voluntary" association since accreditation is a virtual necessity for the successful operation of a school.[35] (Kaplin and Hunter, 1966)

Finally, although as a rule only public bodies are in the purview of the fourteenth amendment ("due process" "equal protection" amendment), accrediting agencies may comprise an exception. If an otherwise private organization is performing a public (quasi-governmental) function or a private organization pursuing purely private activities derives a major source of power and control from the state, due process requirements may apply.

The Courts

The list of court tests of regional accreditation decisions is short and mostly recent. Only three lawsuits have been brought against regional accrediting associations in American history. The first legal action against a regional association was brought in 1938 by the State of North Dakota against the North Central Association. North Dakota Agricultural College had been dropped from membership because its president and seven senior staff members had been removed without stated cause or hearing. The state lost.

The second case was brought by Parsons College in 1967, which also had been disaccredited by North Central Association. The college lost. Both cases concerned expulsion, institutions seeking an injunction in the federal courts to block disaccreditation. The third case is that of Marjorie Webster College against Middle States, a case of prior exclusion from the process of accreditation itself.[36] (Koerner, 1970)

Marjorie Webster College is a two-year proprietary (profit-making) school established in the 1920's in Washington, D.C. In 1946 the college was evaluated by the District of Columbia Board of Education and "accredited" as a junior college authorized to grant the Associate of Arts degree. With some 500 students from all sections of the country working in seven areas (liberal arts, merchandising, fine and commerical art, speech-drama and radio-TV, physical education, secretarial science, and kindergarten education), the college has awarded more than 2,000 associate degrees.

As a corporation organized for profit, Marjorie Webster is controlled by a Board of Directors. All five members of the board are members of the Webster family and several work full time as administrative officers of the college. All stock in the corporation is held by the family, and directors collectively fix their own compensation which in 1969 came to over $100,000.[37] (Koerner, 1970)

The college had attempted to seek evaluation by the Middle States Association, but the agency had refused based upon the policy that they would accept applications only from "a nonprofit institution with a governing board representing the public interest". The college filed a lawsuit in June, 1966, asking that the court order the association to accept its application and evaluate the college.

The proprietary college based its suit upon three arguments. First, Marjorie Webster asserted that the agency's rejection of its application hindered the operation of the college to the extent that it created a restraint of trade under the Sherman Anti-Trust Act. Underlying this argument were the premises that the college's activities constituted "trade or commerce", the "trade" was being restrained by lack of accreditation, and the argument for the restraint - the non-profit criterion - was unreasonable.

The second argument was based upon an emerging principle of common law. Under such a principle, if a private association operating in an area of vital public concern, enjoys a sort of monopoly power, said association must exercise this power in the public interest.

Finally, the college turned to the Constitution of the United States, asserting that accreditation is a "quasi-governmental function" and that Middle States, when engaging in this function, is subject to the restraints of the Constitution - in particular the due process clause. This argument was based primarily on the role that accrediting agencies play in the distribution of funds under the federal aid-to-education statutes[38] (Kaplan, 1971)

The trial court, the United States District Court for the District of Columbia, upheld all of Marjorie Webster's arguments, issuing it's opinion in July, 1969. In June, 1970, the United States Court of Appeals for the District of Columbia Circuit reversed the District Court's decision. Yet, despite the reversal, the case was of major significance. In both previous instances when accrediting agencies were taken to court (North Dakota and Parsons) the traditional judicial reluctance to interfere with the freedom of private organizations to select or reject members prevailed, this was not true of the District Court decision.

It is important to realize that although the court of appeals overturned the district court'srulings, it did not reject any of the underlying legal principles. For the first time, the common law "monopoly" theory has been held to apply to accrediting agencies. Accrediting agencies have been termed quasi-governmental organizations, limited by the Constitution, and even the anti-trust laws may have a narrow use in situations where an accrediting decision may have been prompted by "commercial motives."

> ...the history of the case suggests that the standards by which higher education is governed may come under increasing scrutiny by the courts, as well as by the educational community itself. The extensive litigation and the public debate it fostered have brought some of the searching questions of governance to the fore. While their solution is a matter initially and primarily for the accrediting agencies themselves,...the courts nevertheless can play an important role when alleged solutions, or their lack, subject institutions or the public to arbitrary and unreasonable exercises of accrediting power.[39] (Kaplin, 1971)

SUMMARY OF CURRENT ISSUES AND RECOMMENDATIONS

The first draft of this report was circulated for review in early October. Copies of the report with a request for comments were sent to each public postsecondary institution, each private accredited institution, representatives of proprietary vocational education, all candidate schools, and state agency personnel charged with education approvals, chartering, or registration. Beyond this, representatives of the various segments with immediate experience in accreditation were interviewed on current issues according to the structured format presented as Appendix F. The response of the Washington Friends of Higher Education is included as Appendix G. The results of this review process are reflected in the recommendations addressing the current issues in accreditation.

Due Process

The legal remedies available to an institution which alleges to have been denied accreditation arbitrarily are uncertain. Recently, in the interest of avoiding litigation, more attention has been paid to due process procedures to be observed by accrediting agencies in either denying an institution/program accreditation or withdrawing accreditation status. This issue may become particularly important if the courts begin to apply the fourteenth amendment to accrediting procedures.*

There are some "due process" procedures in existence. Through the Commissioner's Recognition Procedures for National Accrediting Bodies and State Agencies (published in the Federal Register), the Office of Education requires that the accrediting agency assure due process in its accrediting procedures, as demonstrated in part by:

1) Affording initial evaluation of the institutions or programs only when the chief executive officer of the institution applies for accreditation of the institution or any of its programs;

2) Providing for adequate discussion during an on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

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*See p. 21 (section on the courts).

3) Furnishing, as a result of an evaluation visit, a written report to the institution or program commenting on areas of strengths, areas needing improvement and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

4) Providing the chief executive officer of the institution or program with an opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the accrediting agency or association takes action on the report;

5) Evaluating, when appropriate, the report of the visiting team in the presence of a member of the team, preferably the chairman;

6) Providing for the withdrawal of accreditation only for cause, after review, or when the institution or program does not permit reevaluation, after due notice;

7) Providing the chief executive officer of the institution with a specific statement of reasons for any adverse accrediting action, and notice of the right to appeal such action;

8) Establishing and implementing published rules of procedure regarding appeals which will provide for:

    a) No change in the accreditation status of the institution or program pending disposition of an appeal;

    b) Right to a hearing before the appeal body;

    c) Supplying the chief executive officer of the institution with a written decision of the appeal body, including a statement of specifics.[40] (Federal Register, 1974)

The accrediting agencies themselves usually develop appeals procedures and the Northwest Association has published in its Accreditation Procedural Guide its process of appeal.*

Despite the development of due process procedures by the various accrediting agencies, the importance and ambiguity of the issue has kept it open to debate and subject to various interpretations. For example, two attorneys, both conversant with but not connected with the activities of regional accrediting commissions, developed two very different models of due process for a Workshop on Due Process in Accreditation in 1970.* Their differing views make it clear that the structure of due process is not fixed.

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*See Pages 15 & 16

Those interviewed agreed as to the extreme importance of due process in the actions of the commission but differed in their assessment of the adequacy of current practice. The primary objections grow out of the summer 1975 meeting where the commission admitted to candidacy an Oregon institution while deferring action on another applicant for candidacy.

The unsuccessful applicant (a Washington-based college) complained: that the time allowed them at the hearing had been significantly reduced because of a crowded agenda; that the standards of finance cited as one reason for deferral had not been evenly applied to the other institution admitted to candidacy at that hearing; that the reasons for deferral given in the written notice from the commission differed in some respects from the reasons given verbally immediately following the hearing; and that the reasons for deferral should in any event be more specific to allow an adequate response.

The institution further asserted that deferral of candidacy would exclude it from access to various grants, further exacerbating its financial problems. In response to the institution's appeal its application was reheard at a special meeting of the commission in September 1975, three months before the time originally specified for rehearing. As a result, the school was awarded candidacy status with certain requirements and restrictions.

The importance of specificity in reasons for decisions and in restrictions imposed on the operation of institutions as a condition of accreditation was an issue raised by more than one of those interviewed. The above instance illustrates the critical nature of due process in the functioning of the commission.

RECOMMENDATION #1

> The Council for Postsecondary Education endorses the efforts of the Commission on Colleges of the Northwest Association of Schools and Colleges in monitoring its provisions and practice against available models of due process and against the experiences of other commissions and recommends that the commission continue to adopt such provisions and practices as are indicated by that monitoring.

Confidentiality

One aspect of due process deserving of special attention is the necessary balance between confidentiality and public disclosure. The accrediting bodies do not deny their public service nature. They have been characterized as quasi-public agencies, and they have come to enjoy near-monopoly power in certain areas. These aspects will tend to limit the degree of confidentiality they may enjoy.[41] (Heilbron, 1976)

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*See Appendix C

In this general context, the balance between confidentiality and public accountability has become an issue in another state. In 1975 legislation was proposed in California (AB-1854) which would require:

> ...accrediting associations or agencies to conduct public meetings when deliberating concerning the accreditation or approval of postsecondary institutions located in California and such accreditation or approval is a condition for any state governmental action. This bill would also permit executive sessions to be held under specified circumstances. (emphasis added)

No explicit reference to public meetings is made in the policy statements of the Northwest Association. One explicit reference to confidentiality occurs in the procedural guide:

> The (evaluation) committee report is considered confidential. No outsider is given access to it through the committee members, the Commission, or the office of the executive director. The chief administrator of the institution is provided with twenty-five to fifty copies of the report. It is expected that he will make wide internal circulation of the report.[42]

As a result of the increasingly public role of the private accrediting agencies it may be that they will be able to keep confidential only those sorts of records and information that, if disclosed, would seriously impair their operation. They may also be required to disregard, in reaching their decisions, information they are unwilling to disclose and to afford the institution the right of cross-examination of adverse witnesses.[43] (Heilbron, 1976) Along these general lines and perhaps as an alternative to unweildy public meetings, one interviewee recommended the maintenance of and access to minutes of commission hearings.

RECOMMENDATION #2

> The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges determine the practical limits of disclosure and consider expanding the documentation of its hearings for general or limited public disclosure.

Regionalism

Whatever the reason(s) why the institutional accrediting associations developed along regional, rather than state or national lines (perhaps, as Puffer suggests, an historical accident),[44] there would seem to be current reasons for having these associations larger than statewide. One reason is the desirability and the current practice of avoiding the presence on evaluation teams and on deliberative bodies for applicant institutions of representatives from similar, adjacent, and perhaps competing (for clients and resources) member institutions. Conflict of interest would be harder to avoid in statewide associations with statewide clientele.

Another cogent argument for regional associations is made by the example of the Western Accrediting Association (a marginally regional association composed of California, Hawaii, and Guam).

> The most serious problem is a possible untenable relationship with the State of California. In case of wide and long continued differences or disputes with California authorities, great pressures could be brought against the Western Association to yield or to be put out of business. The latter could readily be accomplished by legislation forbidding the payment of any state funds by any publicly supported institutions to the regional accrediting association.[45] (Puffer, 1970)

The author goes on to state that "a merger of the Western and the Northwest Associations is currently (1970) under consideration." and to recommend that merger. The possibility of merger is still (1976) under consideration, and articles of incorporation (as a Washington corporation have been drafted for consideration at the December meeting of the Northwest Association (Appendix H). The current proposal to form a confederation between the Northwest and Western Associations would retain as autonomous commissions the five* existing commissions.

With one exception those interviewed strongly favored retention and extension of the regional nature of the commission. The primary reasons given were that statewide scope might lead to provincialism and would surely heighten the potential for conflict of interest within the commission and on evaluation teams, whereas national scope would ignore regional differences among institutions. Even the representatives of a nationally accredited institution noted the possibility of regional distinctions that might prove important. Not all of those interviewed ventured an opinion on the proposed confederation, but those who did favored broadening the regional base for the reasons stated above.

RECOMMENDATION #3

> The Council for Postsecondary Education recognizes the desirability of regional scope for the Northwest Association and recommends the extension of that scope to the proposed Northwest-Western Association of Schools and Colleges.

Representation

The Commission on Colleges of the Northwest Association numbers 25 including the chairman and the executive director as ex-officio members. Commissioners (executive director excepted) are elected by the full delegate assembly at the annual (December) meeting for staggered three-year terms. Provision is made for three representatives of the general public (lay members of institutional boards) and two representatives of institutions of adjoining regions (both current representatives from Western Association region). An annotated list of the Commission membership is given as Appendix D.

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*The Western Association maintains separate commissions for junior colleges and 4-year institutions.

In addition to representation on the Commission, public representatives (again, members of institutional boards) and representatives from other regions are trained as evaluators and included as full members of visiting teams. Beyond this the Commission has in the past included staff of legislative committees, of state agencies charged with veterans approval, and of State Coordinating commissions in its college evaluators' conferences. Council staff have been invited to accompany as observers the evaluation team to Whatcom Community College.

Of those interviewed with regard to accreditation all favored inclusion of public members on the commission and most on evaluation teams. The respondents were split with regard to the limits of "public" representation; some feeling that the current limitation to board members of member institutions should be retained for reasons of expertise, others feeling that public input should be expanded to encompass expertise and perspectives of a noneducational nature.

RECOMMENDATION #4

The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges consider including in its public representation both on the commission itself and on evaluation teams non-board members as well as members of institutional governing boards.

General Education Requirement

The scope of institutions eligible for regional accreditation has for some time been restricted by the "general education" requirement (see item 5 in conditions of eligibility, page 11). This condition for eligibility has acted (whether intentionally or not) to dissuade specialized institutions, both public and private, from seeking regional accreditation.

The FRACHE policy statement on general education requirements (adopted as policy by the Northwest Association) is broad enough in its provisions to encompass most specialized programs:

> This policy expresses a principle of general education which the Northwest Commission on Colleges considers to be a desirable characteristic of postsecondary institutions. By design, the policy is qualitative rather than quantitative. No formula for specific application or particular pattern of general education is endorsed, since this determination is considered to be the prerogative of the institution.
>
> General education is recognized as an important component of all postsecondary educational programs. Postsecondary institutions must identify and provide a recognizable core of general education that expresses the educational philosophy of the institution for each degree program or cluster of degree programs. In some cases, institutions may provide for general education degree requirements through admission or graduation prerequisites. Institutions are encouraged to include general education in non-degree specialized programs.

General education may include educational experiences which provide: introduction to the major areas of knowledge; opportunity for acquiring the skills and knowledge necessary for living in a complex modern society; and opportunity for the development of basic learning skills and foundations necessary for success in mastering advanced specialized subject matter.

General education in specialized degree programs shall be of collegiate level. The content of general education in specialized degree programs should be comparable, though not necessarily identical, to traditional academic offerings and should be taught by appropriately qualified faculty.

Programs in postsecondary vocational-technical institutions need to evidence recognition of the relationship between broad education and the acquisition of techniques and skills. While an appropriate level of mastery in occupations and technologies is recognized as fundamental, every worthy institution should also strive for the development of student character, and the preparation of its students to live in the world. Programs need to develop within students the capabilities of forming independent judgments, weighing values, and understanding fundamental theory, in addition to amassing facts and mastering skills. The institutional effort in helping its students become contributing and useful members of society, other than through its specific occupational and technical offerings, should be demonstrated in the performance of the institution's graduates. In any type of program, the general education courses, as well as vocational- technical courses, should be taught by staff members who are qualified in the subject being taught.

General education designed specifically for specialized programs should be clearly and accurately described in official publications of the institution.[46] (NASC, Policy Statement, 1975)

A revision of this policy statement proposed to the 1976 summer meeting of the Commission on Colleges would make more explicit the latitude of the general education requirements. However, specialized institutions are currently achieving accreditation.

Olympia Technical Community College (formerly Olympia VTI) was accredited in 1975, Missoula Technical Center was accredited (non-degree) in 1974, and in December, 1975, two of Washington's public vocational-technical institutes (Renton VTI and Lake Washington VTI) were awarded candidacy status. The remaining three public VTI's in Washington have decided for the moment not to apply for candidacy status. At the other extreme of specialization the Oregon Graduate Center (no undergraduate program) was accredited in 1973. On the private side, Bassist Institute in Portland, Oregon, a proprietary school, has recently applied for candidacy, setting a precedent for profit-making institutions in this region.

In spite of this apparent expansion in the scope of institutions encompassed by the regional commission it seems certain that a significant fraction of the postsecondary institutions in the state will continue indefinitely to seek and maintain accreditation instead from a national accrediting body (e.g., the National Association of Trade and Technical Schools and the Association of Independent Colleges and Schools). In view of this, a sizeable number of students will be denied access to state programs where regional accreditation is specified for eligibility. The only explicit reference to the Northwest Association of Schools and Colleges found in the statutes of Washington occurs in RCW 28.B.10.802. This reference should be reviewed with regard to its policy implications.

RECOMMENDATION #5

> The Council for Postsecondary Education recommends that the Legislature re-examine the explicit references to the Northwest Accreditation in statutes, existing and proposed, for the policy implications of those references.

Beyond this policy question is a more technical question of the use of the generic term "accreditation" throughout the statutes, but especially in the professional licensing area, without additional modification to indicate which form of accreditation is intended. A review of the Washington Administrative Code did not generally yield a clarification of the term as used.

RECOMMENDATION #6

> The Council for Postsecondary Education recommends that all references to "accreditation" in the Revised Code of Washington and in the Washington Administrative Code be rendered specific to the particular form of accreditation intended.

Candidate Status

The status Candidate for Accreditation has recently come under scrutiny by several concerned observers including the Northwest Association of Schools and Colleges.

Until 1964 there was no Candidate for Accreditation status. An institution had to have been in existence long enough to have graduated at least one regular class before its application for accreditation was accepted. However, new and unaccredited colleges could qualify for Federal programs under the provisions of the "three-letter clause". This meant that if three accredited colleges wrote letter agreeing to accept credits from the unaccredited college, eligibility for Federal programs was granted.

Apparently, at the instance of the Office of Education, and in an attempt to discourage the use of the three-letter clause, a Candidate for Accreditation classification was established. Originally, an application from an institution for candidacy was not accepted until the spring of its first year of operation or later. A "Correspondent" classification was eventually established to cover those institutions which were in operation for less than a year. So these young institutions might be eligible for federal funds, the Commissioner wanted "reasonable assurance" that the new institution, not necessarily operative yet, could attain its goals. Originally an informal process through letters and telephone calls, correspondent status was established with formal procedures.*

The Correspondent and Candidate for accreditation classifications were used until 1972 when the Federation of Regional Accrediting Commission of Higher Education**Council decided to drop the Correspondent status and extend the candidate classification to include new postsecondary schools whether in operation or not.

Recognition for candidacy plays an important role in an institution's funding plans. Institutions which do not achieve candidacy find it difficult to attract students; Federal programs remain closed; gifts, grants and contracts are more difficult to secure. While the commissions have insisted that the financial plans be complete and reasonable for the purposes to be served, there seems to be an element of faith in accepting the financial base of some candidates.[47] (Bemis, 1976)

Although candidacy does mean some progress toward accreditation, it does not gaurantee eventual accreditation. "Candidacy has come to mean less and less over the years from our descriptions,conditions, interpretations and procedures for recognizing institutions; however, its importance to the unaccredited colleges can hardly be overemphasized. "48 Candidacy is the primary route through which hundreds of institutions qualify for Federal programs.

Those interviewed favored the retention of the candidate classification as currently defined and implemented by the commission. This seems to be largely because some form of initial recognition and eligibility determination is necessary for new institutions, and the candidacy review is a more rational means of making those judgments than was the three-letter clause. However, concern was expressed that the accompanying review should be as rigorous as the circumstances allow. This concern was also expressed in the response of the Washington Friends of Higher Education (Appendix G). Also as noted below, some institutions make a marked distinction between candidates and member schools in determining transfer of credit.

RECOMMENDATION #7

The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges review its criteria and procedures for determining candidate status to assure the effectiveness and selectivity of the process.

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*See Appendix E

**Later merged with NCA to form COPA.

Beyond this concern for rigor, the interviews revealed a concern for the confusion of candidacy and full accreditation in the minds of the public. This concern was expressed both by candidate and by member institutions. Sample letters of notification from the various regional associations (Puffer, 1970) show that some of them prescribe statements of disclaimer to be used whenever reference is made to the accreditation status of the institution. For example:

> If (your institution) utilizes this affiliation in any of its publications or correspondence, please be careful to indicate that this is simply affiliation, not membership. The Association requests that you use the following statement, if you wish to include this information in your catalog:
>
> > (Your institution) is affiliated with the New England Association of Colleges and Secondary Schools, Inc., in the category of Recognition of Candidacy for Accreditation. Candidacy is not accreditation.

A similar prescribed disclaimer might help to reduce confusion between candidacy status and fully accredited status for the Northwest Association.

RECOMMENDATION #8

> The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges consider adopting a standard disclaimer statement to be used by candidate institutions whenever reference is made to their affiliation with the Northwest Association.

Transfer of Credit

A major and immediate concern of student consumers is the transferability of credit and acceptance of degrees among institutions (especially as it involves institutions which are candidates for accreditation). It has been asserted that one principal purpose of the accreditation process is to "assure the public...that the work done by students should be acceptable by employers, by other accredited institutions, and by government agencies controlling licensure for professional people."[49] However, it must be emphasized that voluntary accreditation only facilitates such judgments on the part of the individual evaluating the student's credentials.

The policy statements of the Northwest Association make no explicit claims with regard to transfer of credit. A preliminary survey of undergraduate transfer policies of Washington public institutions has shown that accreditation status (including candidacy status) is considered in determining acceptability of transfer credits. Admitting a few exceptions, regional accreditation appears to be a necessary but not fully sufficient condition for normal transfer of credit within the state. The ultimate determination is the prerogative of the receiving institution. However, it is difficult to understand why, while four of the state colleges and universities treat credits from in-state candidates the same as those from in-state member institutions, one state college refuses to accept in-state candidate credits (except for Washington community college credits). While no specific recommendation is made at this time, the matter of transfer of credit is identified as one worthy of further consideration.

Nontraditional Institutions

The growth pains of nontraditional education have been summarized by the Council for Postsecondary Accreditation.

> Since the reports of the Carnegie Commission Study on Higher Education began to appear in the latter 1960's, closely followed by the work and reports of the Commission on Nontraditional Education completed in 1974, the demand placed upon institutions of postsecondary education to develop new delivery systems and innovative learning forms of postsecondary education has been enormous. Many institutions have responded with the creation of new programs for new clienteles at a rate far too rapid to allow for adequate planning and training of faculty in the delivery of nontraditional educational programs. Dr. Samuel B. Gould, Chairman of the Commission on Nontraditional Education, states that 670 institutions developed and implemented nontraditional educational programs since 1973. This would include external degrees, competency-based education, modular curriculum designs, multi-media instructional degree programs, learning contracts for degrees, and experiential learning.[50] (COPA, 1976)

This growth confronts the regional accrediting associations with new, unusual, and seemingly insoluble problems in attempting to assess the quality of educational service in the new environment of nontraditional education. Some regional accrediting commissions have developed new procedures. The Northwest Association has worked from the interim guidelines on "Accreditation and Nontraditional Study" developed by the Federation of Regional Accrediting Commissions of Higher Education in 1973 (Appendix I).

Currently COPA in cooperation with the regional associations is engaged in a year-long study to develop evaluative criteria for the accreditation of nontraditional education. The purposes of that study ar to

> (1) identify the essential elements that should be present in the various types of nontraditional study programs that lead to a degree--e.g., associate, baccalaureate, master's and doctorate; (2) develop a classification of the types of nontraditional education programs; (3) develop appropriate criteria and evaluation procedures for nontraditional educational programs and institutions for use by accrediting commissions; and (4) propose a new national policy to facilitate uniform approaches to the development and evaluation of nontraditional educational programs and institutions. (COPA proposal to Kellogg Foundation, 1976)

Projected outcomes of the COPA study include development of a policy statement which would establish (1) the essential elements that should be present in nontraditional institutions and programs and (2) the criteria that should be used in developing and evaluating these entities. These and other results of the study should be carefully monitored by the Northwest Association.

RECOMMENDATION #9

The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges develop and adopt special criteria and procedures for the evaluation of nontraditional education.

Consumer Protection

There is considerable support for strengthening state approval of postsecondary institutions. There are two conceivable layers of state approval. The first is incorporation, or chartering, a function present in all states. In Washington, it is discharged by the Secretary of State's Office (RCW 23A.12 and RCW 24.03). In addition, proprietary schools are registered with the Division of Motor Vehicles (RCW 18.82). Neither of these requirements, however, involves review and evaluation approaching the accreditation process. The second layer of state approval is institutional operating approval. This is a more substantial form of approval because it involves education requirements in addition to corporate ones. Unlike most other states, Washington has established no authority for operating approval.

Washington state agencies currently discharge approval functions on behalf of the Veteran's Administration, and this limited appraisal comprises the only institutional review conducted in the state. Under annual contract with the VA the Washington State Commission for Vocational Education approves vocational programs for veterans' benefits. The Superintendent of Public Instruction's Office performs the same function for academic programs.

The accrediting community recognizes the need to strengthen state approval.

> Political pressures on the United States Office of Education to control the accreditation process stem partially from cases of misuses of federal funds by irresponsible operators. The voluntary accreditation community believes that the adoption by the states of rigid chartering standards would reduce this problem and make unnecessary a massive federal effort to control the problem through undue regulation of the accreditation process. Uniform adoption of the model legislation of the Education Commission of the States, or of similar legislation, is thus regarded as important to the maintenance of local control over education.[51] (Coonrod, 1976)

> ...a dual system--state and private--relating to accreditation may still provide some answers to the major question of this paper. The Education Commission of the States has recommended a model approval statute for adoption by the states.* Under such a law the state licenses every postsecondary educational operation for a period of one or two years and establishes certain minimum standards and criteria for licensing.... The important aspect of state approval is that it applies to every postsecondary educational operation in the state, and thus operations which now escape any form of examination or review by reason of not applying for accreditation will find themselves subject to state regulation. The substantive evil of false advertising and recruiting will be dealt with on a broad scale that is not substantially touched by the prevailing form of private accreditation.... The chances for erroneous accreditation are considerably cut down by the licensing procedure; indeed, since accrediting is a slow and considered process, prior licensure may be deemed a requisite.[52] (Heilbron, 1976)

Those interviewed tended to agree that accreditation was not and could not be an effective mechanism for policing educational consumer abuses. They also strongly favored establishment of a state approval function to complement private voluntary accreditation.

RECOMMENDATION #10

> The Council for Postsecondary Education recommends the adoption of legislation establishing state operating approval for postsecondary institutions in Washington.

In view of the number of agencies currently involved in registration or approval of postsecondary institutions, the addition of state operating approval suggests the need to consolidate functions.

RECOMMENDATION #11

> The Council for Postsecondary Education recommends that the agency charged with state operating approval of postsecondary institutions also be designated by the Governor as the state agent for conducting approval of educational programs for federal Veterans' benefits.

Among the problems to be addressed by a dual system of state approval and accreditation is the problem of out-of-state operations. COPA has recently summarized the problem.

> Institutions with little or no experience in running off-campus degree programs have plunged into such operations.

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*The CPE in its Planning and Policy Recommendations endorsed legislation based on this model (Recommendation No. 46).

In response to demands, institutions have sponsored programs off campus for which they have no counter-parts on campus.

Institutions in some instances have formalized a differential standard of quality by labeling credits earned off-campus as being not acceptable on campus.

Institutions have offered off-campus programs that require little or no involvement or oversight by on-campus faculty. In some instances, responsibility for the operationally separate units has been contracted out.

Institutions have established satellite operations far removed from the parent campus, often crossing state and even regional boundaries.

Off-campus offerings have ranged from large, relatively permanent educational units to short-term ventures consisting of one course, one faculty member hired locally, and a handful of students. (COPA Policy Statement on Off-Campus Degree Programs, October, 1976)

In addressing these problems COPA:

Commends the efforts of accrediting bodies to deal with this problem and lends its full support to them in holding accredited institutions responsible for all educational programs offered under their auspices. Accrediting bodies are urged to require that institutions keep them informed as to the existence and nature of all off-campus operations and to advise schools that they could lose their institutional accreditation if they fail to do so or if such operations prove to be academically substandard.

Urges accrediting bodies, particularly the institutional accrediting organizations to include in their accrediting practices policies that cover the problem of off-campus programs. The regional commissions in particular are urged to complete work quickly on the memorandum of agreement, now under development, that will provide machinery for dealing with institutions located in one region but sponsoring satellite educational units in other regions. (It is hoped that final agreement on procedures could be achieved by the time of COPA's Winter Invitational Conference, February 4-6, 1977).

Directs COPA staff to establish a National Clearinghouse, effective immediately, to receive and process information concerning off-campus-degree programs. The clearinghouse should be prepared to receive signed statements raising questions about the legitimacy and/or quality of any such operations. These statements should be forwarded to the appropriate accrediting bodies and to interested state and federal offices. COPA will expect to be notified by the accrediting bodies as to any action taken.

This nationwide effort on the part of the voluntary accrediting associations may prove to be effective in dealing with a problem which has grown to national dimensions. In the meantime, and in the absence of state operating approval, the Northwest Association is pursuing a practice of joint visits to satellite operations of out-of-region institutions. Here the primary authority for accreditation rests with the parent regional association, and more experience is needed to assess the effectiveness of this voluntary regional reciprocity.

RECOMMENDATION #12

The Council for Postsecondary Education endorses the practice of joint visits to satellite operations of extra-regional accredited institutions currently pursued in the Commission on Colleges of the Northwest Association of Schools and Colleges in cooperation with other regional commissions and recommends complete reciprocal cooperation on their part.

A special facet of the problem of out-of-state and out-of-region satellites is the operation of educational programs on military bases, often by out-of-state or out-of-region institutions who do not necessarily restrict service to military personnel and related individuals (see Appendix J).

RECOMMENDATION #13

The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges re-examine its policy with respect to military sponsored educational programs in the light of emerging national policy with respect to satellite operations in general.

Another area of potential concern in consumer protection is the lending of accreditation through a contractual arrangement between an accredited institution and a non-accredited one (see Appendix K and L). Such a situation is loaded with potential for lapses in control, defection from standards, and, ultimately, disservice to consumers.

RECOMMENDATION #14

The Council for Postsecondary Education recommends that the Commission on Colleges of the Northwest Association of Schools and Colleges re-examine its interim guidelines on contractual relationships with non-regionally accredited organizations in light of recent experience and emerging national policy on this subject.

CONCLUSIONS

Private voluntary accreditation as conducted by the Commission on Colleges of the Northwest Association of Schools and Colleges serves a desirable purpose in postsecondary education. The peer evaluation on which it is based is important to the maintenance of educational standards and institutional self-improvement. However, this role can be strengthened by the establishment of complementary state authorization to operate for all postsecondary institutions. The voluntary nature of accreditation, the ultimate limits to the scope of institutions covered, and the practical limits to the speed of the accreditation process leave many consumer problems outside the purview of the accreditation mechanism.

The regional associations will be required to continue the evolution of policies and practices if they are to keep pace with institutional evolution, but the state must retain basic responsibility for consumer protection and consumer redress.

FOOTNOTES

1. Selden, William, "Nationwide Standards and Accreditation," p. 213
2. Selden, William, "Study of Accreditation of Selected Health Educational Programs"
3. COPA, *Major Issues in Accreditation: The President's Annual Report, 1975-76*, p. 4
4. Ibid., p. 6
5. Selden, William, "Nationwide Standard and Accreditation," p. 213
6. COPA, *The Balance Wheel for Accreditation*
7. Orlans, Harold, *Private Accreditation and Public Accountability*, p. 27
8. Stetson, Fred L., *The History of the Northwest Association of Secondary and Higher Schools*, p. 7
9. Constitution and Bylaws of the Northwest Association of Schools and Colleges, 1974 Revision, p. 114
10. Puffer, Clyde, *Regional Accreditation of Institutions of Higher Education*, p. 137
11. Northwest Association of Schools and Colleges, *Accreditation Procedural Guide*, p. 1
12. Ibid., p. 3
13. Ibid., p. 4
14. Ibid., p. 4
15. Ibid., p. 4
16. Northwest Association of Schools and Colleges, *Information and Policy Statements*, p. 70
17. Northwest Association of Schools and Colleges, *Accreditation Procedural Guide*, p. 4
18. Ibid., p. 12
19. Ibid., p. 13

20. Boyer, Ernest, "Managing Tomorrow's Education," p. 15

21. San Francisco Chronicle, "Education Top Industry in U.S.", September 2, 1974

22. Kaplin, W.A. and Hunter, J.P., "The Legal Status of the Educational Accrediting Agency: Problems in Judicial Supervision and Governmental Regulation," p. 126

23. Ibid., p. 127

24. Ibid., p. 128

25. Orlans, Harold, Private Accreditation and Public Accountability, p. 201

26. Ibid., p. 199

27. RCW 47.01.110

28. RCW 18.78.100

29. RCW 18.52.110

30. RCW 18.64.080

31. Kaplin and Hunter, op. cit., p. 121

32. Seidman, Harold, Accreditation and Federal Funding, in Orlans, p. 233

33. Kaplin and Hunter, op. cit., p. 108

34. Ibid., p. 113

35. Ibid., p. 114

36. Koerner, James, "The Case of Marjorie Webster," p. 41

37. Ibid., p. 41

38. Kaplin, W.A., "The Marjorie Webster Decisions on Accreditation," p. 220

39. Ibid., p. 223

40. "Criteria and Procedures for Recognizing Accrediting Agencies," Federal Register, 1974

41. Heilbron, Louis, Confidentiality and Accreditation, p. 9.

42. Northwest Association of Schools and Colleges, Procedural Guide, p. 12

43. Heilbron, op. cit., p. 10.

44. Puffer, op. cit., p. 264

45. Puffer, op. cit., p. 140

46. Northwest Association of Schools and Colleges, Policy Statement, p. 78

47. Bemis, James, "Working Paper for Meeting of Executive Directors of Regional Postsecondary Accrediting Commissions," Northwest Association of Schools and Colleges, 1976, p. 3

48. Ibid., p. 3

49. Coonrod, Robert, "Chaos or Coordination in Accreditation," p. 4

50. COPA, Proposal to Kellogg Foundation, p. 2.

51. Coonrod, op. cit., p. 4.

52. Heilbron, op. cit., pp. 26-27.

APPENDIX A

SENATE RESOLUTION
1976 - 230

By Senators Sandison, Odegaard, Donohue, Benitz, Guess, Scott and Goltz

WHEREAS, The Northwest Association of Schools and Colleges is a private voluntary organization for the development of improved relations and educational quality among and within secondary and higher educational institutions; and

WHEREAS, The Northwest Association has assumed and is recognized as possessing regional responsibility for evaluating and accrediting Washington-based postsecondary educational institutions; and

WHEREAS, While the participation of postsecondary educational institutions in the Northwest Association's accreditation process is voluntary, their eligibility for various tax benefits and student assistance programs, and to a great extent the capacity of their students to transfer credits, is contingent upon accreditation by the Northwest Association;

NOW, THEREFORE, BE IT RESOLVED, That the Council for Postsecondary Education undertake a study of the role of the Northwest Association of Schools and Colleges in the certification of postsecondary educational institutions operating in Washington; and

BE IT FURTHER RESOLVED, That the Council include in its study a review of the accreditation process as it relates to (a) the variety of postsecondary educational enterprises operative in the state, (b) the desirability of non-education representatives in the accreditation process, (c) the effectiveness of accreditation, or the lack thereof, as a means of control of consumer abuses in postsecondary education, and (d) the relationship of accreditation to new and innovative degree programs and educational delivery systems in the state; and

BE IT FURTHER RESOLVED, That the Council for Postsecondary Education report its findings and recommendations to the Senate Committee on Higher Education on or before December 1, 1976; and

BE IT FURTHER RESOLVED, That the Senate Committee on Higher Education review the information provided by the Council and study any effect the actions of the Northwest Association of Schools and Colleges has on policy formation in postsecondary education institutions in Washington; and

BE IT FURTHER RESOLVED, That the Senate Committee on Higher Education report its findings and recommendations to the Washington State Senate on or before January 1, 1977; and

BE IT FURTHER RESOLVED, That the Northwest Association of Schools and Colleges and the State Board for Community College Education be requested to cooperate in these studies; and

BE IT FURTHER RESOLVED, That a copy of this resolution be transferred immediately upon adoption by the Secretary of the Senate to the House of Representatives, the Northwest Association of Schools and Colleges, the State Board for Community College Education, and to the Council for Postsecondary Education.

I, Sid Snyder, Secretary of the Senate
do hereby certify that this is a true and
correct copy of Senate Resolution No. 1976-230
adopted by the Senate March 15, 1976.

Sid Snyder

SID SNYDER
Secretary of the Senate

APPENDIX B

HIGHER INSTITUTIONS

Institution	*Accreditation*		*Degrees*[1]	*Enrollment*[2]	*Address*	*Chief Executive*
	Original	*Reaffirmed*				
			ALASKA			
Alaska Methodist University	1964	1970	B,M	878	Anchorage 99504	Robert K. Dellenbach
Sheldon Jackson College	1966	1973	A	245	Sitka 99835	Merton Munn
University of Alaska, Anchorage	1974	---	A,B,M	7,281	Anchorage 99504	Lewis E. Haines
Anchorage Community College						
Anchorage Senior College						
Kenai Peninsula Community College						
Kodiak Community College						
Kuskokwim Community College						
Matanuska-Susitna Community College						
University of Alaska, Fairbanks	1934	1974	A,B,M,D	4,645	Fairbanks 99701	Howard A. Cutler
Tanana Valley Community College						
			IDAHO			
Boise State University	1941	1974	A,B,M	9,331	Boise 83725	John B. Barnes
College of Idaho	1922	1973	B,M	844	Caldwell 83605	William C. Cassell
College of Southern Idaho	1968	1974	A	2,179	Twin Falls 83301	James L. Taylor
Idaho State University	1923	1974	A,B,M,D	6,889	Pocatello 83209	Myron L. Coulter
Lewis-Clark State College	1964	1973	A,B	1,319	Lewiston 83501	Jerold O. Dugger
North Idaho College	1947	1973	A	1,129	Coeur d'Alene 83814	Barry Schuler
Northwest Nazarene College	1930	1967	B	1,017	Nampa 83651	Kenneth H. Pearsall
Ricks College	1936	1969	A	5,330	Rexburg 83440	Henry B. Eyring
University of Idaho	1918	1974	B,M,D	7,676	Moscow 83843	Ernest W. Hartung
			MONTANA			
Carroll College	1949	1970	B	1,261	Helena 59601	Francis J. Kerins
College of Great Falls	1935	1968	B	982	Great Falls 59405	Msgr. Anthony M. Brown
Dawson College	1969	1974	A	403	Glendive 59330	James Hoffman
Eastern Montana College	1932	1969	B,M	3,005	Billings 59101	Stanley J. Heywood
Flathead Valley Community College	1970	1975	A	1,216	Kalispell 59901	Donald G. Lindahl
Miles Community College	1971	---	A	526	Miles City 59301	Vernon R. Kailey
Missoula Technical Center	1974	---	(non-degree)	809	Missoula 59801	T. E. Downey
Montana College of Mineral Science and Technology	1932	1970	B,M	848	Butte 59701	Fred W. DeMoney
Montana State University	1932	1970	B,M,D	8,474	Bozeman 59715	Carl W. McIntosh
Northern Montana College	1932	1967	A,B	1,008	Havre 59501	Duane M. Leach
Rocky Mountain College	1949	1967	B	513	Billings 59102	Bruce T. Alton
University of Montana	1932	1968	B,M,D	8,981	Missoula 59801	Richard C.Bowers
Western Montana College	1932	1967	B,M	765	Dillon 59725	James E.Short
			NEVADA			
Clark County Community College	1975	---	A	5,959	N. Las Vegas 89030	R. Stephen Nicholson
Northern Nevada Community College	1974	---	A	600	Elko 59801	William J. Berg
University of Nevada, Las Vegas	1964	1970	A,B,M	6,676	Las Vegas 89154	Donald H. Baepler
University of Nevada, Reno	1938	1968	A,B,M,D	7,405	Reno 89507	Max Milam
Western Nevada Community College	1975	---	A	3,964	Carson City 89701	J. Clark Davis
			OREGON			
Blue Mountain Community College	1968	1974	A	1,061	Pendleton 97801	Ronald L. Daniels
Central Oregon Community College	1966	1972	A	1,352	Bend 97701	Frederick H. Boyle
Chemeketa Community College	1972	---	A	8,434	Salem 97308	Donald L. Newport
Clackamas Community College	1971	---	A	5,190	Oregon City 97045	John Hakanson
Clatsop Community College	1965	1971	A	2,438	Astoria 97103	Philip L. Bainer
Columbia Christian College	1975	---	A,B	199	Portland 97220	J. P. Sanders
Concordia College	1962	1966	A	199	Portland 97211	Erhardt P. Weber
Eastern Oregon State College	1931	1968	A,B,M	1,543	La Grande 97850	Rodney A. Briggs
George Fox College	1959	1970	B	471	Newberg 97132	David C. LeShana
Judson Baptist College	1974	---	A	165	Portland 97220	C. Neal Davis
Lane Community College	1968	1974	A	6,792	Eugene 97401	Eldon G. Schafer
Lewis and Clark College	1943	1967	B,M	3,037	Portland 97219	John R. Howard
Linfield College	1928	1968	B,M	990	McMinnville 97128	Charles U. Walker
Linn-Benton Community College	1972	---	A	4,969	Albany 97321	Raymond J. Needham
Mt. Angel Seminary	1929	1969	B,M	126	St. Benedict 97373	Very Rev. Elden Curtiss, O.S.B.
Mt. Hood Community College	1972	---	A	10,030	Gresham 97030	Earl L. Klapstein
Museum Art School	1961	1971	B	184	Portland 97205	Warren A. Wolf (Dean)
Northwest Christian College	1962	1970	B	498	Eugene 97401	Barton A. Dowdy
Oregon College of Education	1924	1968	A,B,M	3,253	Monmouth 97361	Leonard W. Rice
Oregon Graduate Center	1973	---	M.D.	14	Beaverton 97005	Ira C. Keller
Oregon Institute of Technology	1962	1972	A,B	2,168	Klamath Falls 97601	Winston D. Purvine
Oregon State University	1924	1970	B,M,D	15,915	Corvallis 97331	Robert W. MacVicar
Pacific University	1929	1967	B,M	1,011	Forest Grove 97116	James V. Miller
Portland Community College	1970	1975	A	15,145	Portland 97219	Amo De Bernardis
Portland State University	1955	1975	B,M,D	14,868	Portland 97207	Joseph C. Blumel

Reed College	1920	1968	B,M	1,181	Portland 97202	Paul E. Bragdon
Southern Oregon College	1928	1967	A,B,M	4,494	Ashland 97520	James K. Sours
Southwestern Oregon Community College	1966	1972	A	2,819	Coos Bay 97420	Jack E. Brookins
Treasure Valley Community College	1966	1970	A	1,312	Ontario 97914	Emery Skinner
Umpqua Community College	1970	1975	A	1,184	Roseburg 97470	I. S. Hakanson
University of Oregon	1918	1967	A,B,M,D	19,708	Eugene 97403	William B. Boyd
University of Portland	1934	1970	B,M	2,147	Portland 97203	Rev. Paul E. Waldschmidt, C.S.C.
Warner Pacific College	1961	1971	B,M	438	Portland 97215	E. Joe Gilliam
Western Baptist Bible College	1971	---	B	505	Salem 97302	W. Thomas Younger
Western Conservative Baptist Seminary	1969	1974	M	476	Portland 97215	Earl D. Radmacher
Willamette University	1924	1970	B,M	1,682	Salem 97301	Robert P. Lisensky

UTAH

Brigham Young University	1923	1966	A,B,M,D	26,515	Provo 84602	Dallin H. Oaks
College of Eastern Utah	1945	1971	A	626	Price 84501	Dean M. McDonald
Dixie College	1945	1972	A	1,227	St. George 84770	Ferron C. Losee
Snow College	1953	1972	A	847	Ephraim 84627	J. Marvin Higbee
Southern Utah State College	1933	1973	A,B	1,811	Cedar City 84720	Royden C. Braithwaite
University of Utah	1933	1966	A,B,M,D	23,142	Salt Lake City 84112	David P. Gardner
Utah State University	1924	1968	B,M,D	9,850	Logan 84322	Glen L. Taggart
Utah Technical College at Provo	1969	1974	A	3,138	Provo 84601	Wilson W. Sorensen
Utah Technical College at Salt Lake	1969	1974	A	5,644	Salt Lake City 84107	Jay L. Nelson
Weber State College	1932	1974	A,B	8,574	Ogden 84403	Joseph L. Bishop
Westminster College	1936	1970	B	933	Salt Lake City 84105	Manford A.Shaw

WASHINGTON

Bellevue Community College	1970	1975	A	7,243	Bellevue 98007	Merle E. Landerholm
Big Bend Community College	1965	1972	A	1,208	Moses Lake 98837	Robert J. Wallenstein
Centralia College	1948	1970	A	3,301	Centralia 98531	Nels W. Hanson
Central Washington State College	1918	1969	B,M	6,946	Ellensburg 98926	James E. Brooks
Clark College	1948	1970	A	4,908	Vancouver 98663	Richard A. Jones
Columbia Basin College	1960	1970	A	4,629	Tri Cities 99301	Fred L. Esvelt
Eastern Washington State College	1919	1968	B,M	6,390	Cheney 99004	Emerson C. Shuck
Edmonds Community College	1973	---	A	3,671	Lynnwood 98036	James R. Warren
Everett Community College	1948	1969	A	6,080	Everett 98201	Norman H. Clark
The Evergreen State College	1974	---	B	2,446	Olympia 98505	Charles J. McCann
Fort Steilacoom Community College	1972	---	A	5,106	Tacoma 98499	Marion O. Oppelt
Fort Wright College	1932	1968	B,M	334	Spokane 99204	Sister Helen Volkomener

WASHINGTON (Continued)

Gonzaga University	1927	1966	B,M	3,185	Spokane 99202	Rev. Bernard L. Coughlin, S.J.
Grays Harbor College	1948	1971	A	1,008	Aberdeen 98520	Joseph A. Malik
Green River Community College	1967	1973	A	5,725	Auburn 98002	Melvin Lindbloom
Highline College	1965	1973	A	7,438	Midway 98031	Orville Carnahan
Lower Columbia College	1948	1971	A	2,777	Longview 98632	David Story
North Seattle Community College	1973	---	A	4,537	Seattle 98103	Cecil A. Baxter, Jr.
Northwest College, Assemblies of God	1973	---	A,B	551	Kirkland 98033	D. V. Hurst
Olympia Vocational-Technical Institute	1975	---	A	1,735	Olympia 98501	Raymond G. Prevost
Olympic College	1948	1971	A	6,351	Bremerton 98310	Henry M. Milander
Pacific Lutheran University	1936	1969	B,M	3,367	Tacoma 98447	William O. Rieke
Peninsula College	1965	1971	A	1,576	Port Angeles 98362	Paul G. Cornaby
St. Martin's College	1933	1968	B	964	Olympia 98503	Rev. John Scott, O.S.B.
Seattle Central Community College	1970	1975	A	6,388	Seattle 98122	Roy G. Phillips
Seattle Pacific College	1933	1968	B,M	2,249	Seattle 98119	David L. McKenna
Seattle University	1935	1969	B,M	3,736	Seattle 98122	Rev. Edmund G. Ryan, S.J.
Shoreline Community College	1966	1972	A	7,207	Seattle 98133	Richard S. White
Skagit Valley College	1948	1969	A	4,514	Mt. Vernon 98273	Norwood M. Cole
South Seattle Community College	1975	---	A	2,515	Seattle 98106	Robert C. Smith
Spokane Community College	1967	1973	A	3,554	Spokane 99202	Lloyd E. Stannard
Spokane Falls Community College	1967	1973	A	3,858	Spokane 99204	Gerald L. Saling
Sulpician Seminary of the Northwest	1937	1971	B,M	95	Kenmore 98028	Rev. Melvin Farrell, S.S.
Tacoma Community College	1967	1974	A	5,597	Tacoma 98465	Larry P. Stevens
University of Puget Sound	1923	1969	B,M	4,554	Tacoma 98416	Philip M. Phibbs
University of Washington	1918	1972	B,M,D	36.234	Seattle 98195	John R. Hogness
Walla Walla College	1932	1972	B,M	1,857	College Place 99324	Robert L. Reynolds
Walla Walla Community College	1969	1975	A	2,061	Walla Walla 99362	Eldon Dietrich
Washington State University	1918	1970	B,M,D	15,694	Pullman 99163	Glenn Terrell
Wenatchee Valley College	1948	1970	A	1,868	Wenatchee 98801	William E. Steward
Western Washington State College	1921	1968	B,M	8,601	Bellingham 98225	Paul G. Olscamp
Whitman College	1918	1967	B	1,112	Walla Walla 99362	Robert A. Skotheim
Whitworth College	1933	1968	B,M	1,751	Spokane 99251	Edward B. Lindaman
Yakima Valley College	1948	1971	A	3,082	Yakima 98902	William B. Russell

CANDIDATES FOR ACCREDITATION

Institution	*Year Recognized*	*Degrees*	*Enrollment*	*Address*	*Chief Executive*
City College	1975	A,B	162	Seattle, WA 98014	Michael A. Pastore
Colegio Cesar Chavez	1975	B	100	Mt. Angel, OR 97362.	Celedonio Montez, Jr.
Cornish School of Allied Arts	1974	B	449	Seattle, WA 98102	Melvin Strauss
Helena Vocational-Technical Center	1975	(non-degree)	600	Helena, MT 59601	William A. Korizek
Lake Washington Vocational-Technical Institute	1975	(non-degree)	899	Kirkland, WA 98033	Robert J. Boyden
Land Claims College	1975	A,B	525	Fairbanks, AK 99701	Karen Parr
Marylhurst Education Center	1975	B	147	Marylhurst, OR 97036	Sister Veronica Baxter
Prometheus College	1975	B,M	53	Tacoma, WA 98445	Ernest J. DeRocher
Renton Vocational-Technical Institute	1975	(non-degree)	1,527	Renton, WA 98055	Robert C. Roberts
Rogue Community College	1972	A	1,404	Grants Pass, OR 97526	Henry O. Pete
Sierra Nevada College	1973	B	117	Incline Village, NV 89450	Benjamin Solomon
University of Alaska, Southeastern Region Juneau-Douglas Community College Ketchikan Community College Senior College Sitka Community College	1974	A,B,M	1,069	Juneau, AK 99801	Charles O. Ferguson
University of Oregon, Health Sciences Center	1975	B,M,D	1,554	Portland, OR 97201	Lewis W. Bluemle, Jr.
Whatcom Community College	1972	A	1,561	Bellingham, WA 98225	Robert E. Hamill
1550th Aircrew Training and Test Wing	1975	(non-degree)	95	Hill Air Force Base, UT 84406	1st Lt. Donald P. Wolfe, USAF

538,683

Degree Level Abbreviations:
- A–associate degree
- B–bachelor's degree
- M–master's degree
- D–doctoral degree

Enrollment figures indicate total number enrolled and are taken from "Accredited Institutions of Postsecondary Education and Programs," 1975-76, Council on Postsecondary Accreditation.

ASSOCIATE MEMBERS

Institution or Organization	*Year*	*Address*	*Chief Executive*
California Polytechnic State University, San Luis Obispo	1964	San Luis Obispo, California 93401	Robert E. Kennedy
Golden Gate College	1963	San Francisco, California 94105	Otto Butz
Trinity Western College	1974	Langley, B.C. V3A 4R9	R. Neil Snider
Vancouver Bible College	1975	Surrey, B.C. V3S 2A6	Robert C. Anderson

SUMMARY OF HIGHER INSTITUTIONS

	Accredited	*Colleges and Universities*	*Junior Colleges*	*Associate Members*	*Candidates for Membership*
Alaska	4	3	1	–	2
California	–	–	–	2	–
Idaho	9	6	3	–	–
Montana	13	9	4	–	1
Nevada	5	2	3	–	1
Oregon	36	22	14	–	4
Utah	11	6	5	–	1
Washington	44	18	26	–	6
Other	–	–	–	2	–
Total	122	66	56	4	15

APPENDIX C

DUE PROCESS AND APPEALS

A. DUE PROCESS

In this appendix are reproduced in full two model statements of due process prepared by attorneys who are conversant with but not connected with the activities of regional accrediting commissions.

1. Mr. Kaplin's Model

The first was prepared by William A. Kaplin, Office of the General Counsel, Department of Health, Education, and Welfare, as a basis for discussion at the USOE - NCA Workshop on Due Process in Accreditation, Washington, D. C., May 18, 1970. The views expressed are the author's and do not necessarily represent the views of HEW.

"A MODEL FRAMEWORK FOR MAKING ACCREDITATION DECISIONS IN ACCORDANCE WITH DUE PROCESS REQUIREMENTS"

Introduction

This procedural model has been drafted so as to coincide as nearly as possible with the general pattern of accreditation procedures followed by the various regional and professional accrediting agencies. Departures have been made at several key points, however, in order to correct some deficiencies often apparent in existing procedures. The result, hopefully, is a model which embodies the elements of fundamental fairness implicit in the concept of due process yet also permits accrediting agencies considerable flexibility in which to pursue their own particular needs and goals.

The Model set forth below presumes that the accrediting agency has already formulated and published the standards by which it will evaluate candidates for accreditation. While the manner in which such standards are formulated may itself give rise to due process considerations, such issues are largely beyond the model's scope. Rather than addressing itself to the subject matter and detail of the standards formulated by the accrediting agency, this model merely suggests a procedure which would allow applicants a fair opportunity to establish that they qualify under whatever standards exist.

The model also presumes that the accrediting agency has created some type of a committee to receive and consider applications for accreditation. A legitimate due process inquiry could be raised as to whether this committee which applies the agency's standards can be the same one that formulated the standards. Again, however, this issue is unresolved by the model.

I.

Applicant's Self-Study Report and Evaluation Team Report

After receiving a request for accreditation or reaccreditation, the committee on accreditation would: (1) fully inform the applicant of all eligibility criteria, standards for accreditation, and related policies and procedures of the agency; (2) require a self-study report from the applicant school. setting forth information on the applicant's purposes, programs, and strengths and weaknesses; and (3) send an evaluation team to the applicant school to make a similar, though independent, study.

II.

Notice to Applicant of Evaluation Team's Report; Supplemental Material from Applicant

After the committee on accreditation has received the evaluation team's report, it would send a copy to the school. If the accrediting agency requires team members (acting either jointly or individually) to make specific recommendations about granting or denying accreditation, the substance of all such recommendations should be included in the report sent to the applicant. In order to preserve confidentiality, the committee could delete identifying references in the report to the comments or recommendations of individual members of the team.

The committee would provide the applicant school sufficient time, after reading the evaluation team's report and recommendations, to file any supplemental material it determined appropriate to respond to the facts and conclusions set forth in the report.

III.

The Committee's Determination Regarding the Application

After receiving the supplemental material (if any) which is filed by the applicant, the committee on accreditation would make a determination regarding the action to be taken on the school's application for accreditation. This determination would be based upon the information contained in: (1) the applicant's self-study report, (2) the evaluation team's report and recommendations, (3) the supplemental material filed by the applicant in response to the report and recommendations of the evaluation team, and (4) whatever additional material the committee determines to be relevant to the agency's accreditation standards, and regarding which it has informed the school and provided an opportunity for comment.

The committee's determination would (subject to the school's right to a hearing as provided in IV infra) become the accrediting agency's decision on the application for accreditation. If the decision is to grant accreditation, the school would thereupon be added to the list of accredited schools (or, if the application is for renewal of accreditation, the school's accredited status would thereupon be confirmed). If the decision is adverse (e.g., denial or withdrawal of accreditation, probationary status, or deferral of action), it would be accompanied by a specific statement of the committee's reasons for denying accreditation and a notification of the school's right to a hearing.

If the school requests a hearing, the accrediting agency would not make any public announcement of an adverse decision, and would not make any change in a school's status vis a vis accreditation, until such time as the decision has been affirmed by the panel which presides over the hearing.

IV.

The Hearing Subsequent to an Adverse Decision

If a school that has been adversely affected by the accrediting agency's decision requests a hearing, the agency would schedule the proceeding in a manner which provides the school with sufficient time and opportunity to prepare its argument. In order to achieve independant and objective judgment, the hearing would not be conducted by the committee which made the initial decision, and no member of that committee would be selected as a member of the hearing panel. The panel would be composed of five persons chosen (before the fact) by the accrediting agency's board of directors. At least one of these five persons shall have had prior experience on the agency's accrediting committee, and one person (who shall be a person that does not hold and never has held a position in the accrediting agency) shall be selected specifically as a representative of the general public.

The hearing panel would afford representatives of the school the opportunity to appear personally before it to present oral testimony and argument, written documents, and other evidence in the school's behalf. If requested by the school, appropriate representatives of the accreditation committee would be required to appear and explain the basis of the committee's decision, and representatives of the evaluation team would be required to explain the team report.

In addition to considering the evidence adduced at the hearing itself, the hearing panel would also consider the school's self-study report, the evaluation team report, and all other material relied upon by the accreditation committee, as well as the committee's statement of reasons for its decision. No other evidence would be considered by the hearing panel unless the school had been informed of such evidence and given an opportunity at the hearing to respond to it. At the conclusion of its deliberations, the hearing panel would issue its decision and a statement of reasons therefor. The accrediting agency could then take appropriate action with respect to the school's accredited status and could publicly announce the hearing panel's decision and the action taken in reliance upon it.

Summary

While the preceding model of accreditation procedures is intended to provide a flexible decision-making framework, it does incorporate several fundamental principles which should invariably be followed if the concept of due process is to be effectuated. The most significant of these principles are reiterated here:

(1) The agency should provide a copy of the evaluation team's report to the applicant school and give the school an opportunity to respond to it prior to the accreditation committee's decision.

(2) The applicant school should be informed in writing of the basis for the accreditation committee's denial of full accreditation.

(3) Before a decision to deny or withdraw accreditation becomes final, the school should be afforded notice and opportunity for a hearing at which its representatives may appear personally and present oral and documentary evidence.

(4) The accrediting agency should not publicly announce a denial or withdrawal of accreditation, or take action with respect to the school's status, until after completion of a full and fair hearing.

2. Mr. Ehrlich's Model

The second was prepared and presented at the same workshop on May 18, 1970, by Bernard H. Ehrlich, Attorney, Washington, D. C. As can be readily noted, it suggests a somewhat different approach from that of Mr. Kaplin.

"A SUGGESTED DUE PROCESS PROCEDURE IN INSTITUTIONAL ACCREDITATION"

(a) Following the visit of the Examining Committee to the applicant school, the Chairman of the Examining Committee shall prepare a Chairman's Report which will be sent to the chief executive officer of the applicant school prior to its submission to the Commission. This Chairman's Report will fully and fairly describe the findings of the Examining Committee and will describe and comment upon the applicant school's areas of strength, on the areas needing improvement, on possible violations of the published standards and policies of the Accrediting Commission, and on suggested means of improvement.

(b) The applicant school shall have a reasonable time and in any event not less than two weeks from the receipt of the Report to comment upon the factual elements of the Report and to submit any additional written materials it desires to place before the Accrediting Commission in response to the Report.

(c) The applicant school shall be afforded the opportunity to make an oral presentation to the Accrediting Commission at the meeting at which the applicant school's application is to be considered. The oral presentation will be based on the Report and the written materials which the applicant school has submitted. If the applicant school desires to make the oral presentation, the school shall so request not less than ten days prior to the date of the meeting.

(d) The Accrediting Commission will then evaluate the applicant school and make its decision.

(e) In the event the Commission takes action denying accreditation or reaccreditation, or requesting the applicant to show cause why it should not be denied reaccreditation:

- (i) The Commission shall dispatch to the applicant school, within ten days following the action of the Commission, its written statement of findings of fact forming the basis of the action of the Commission.

(ii) The applicant school may appeal the action of the Commission by requesting such appeal in writing within ten days of the receipt of such written statement. If such appeal is requested, the applicant school shall file a written statement of the grounds for its appeal within two weeks after receipt of the Commission's findings.

(iii) The Commission shall set a date for the appeal at the earliest practicable time.

iv) The applicant school at its option and expense may have the right to the presence of counsel at and a transcript of the hearing of such appeal.

(v) The Commission shall keep confidential its action until the applicant school has either failed to appeal as prescribed or the Commission has completed its consideration of the applicant school's appeal.

B. APPEALS

The appeal procedures in each region constitute the remainder of this appendix. They are presented in alphabetical order.

1. MIDDLE STATES APPEAL PROCEDURE

(a) Either Commission will review and may reconsider an accreditation decision upon formal complaint by the administrative head of the institution, filed with the Executive Secretary of the Commission within 60 days of notice of the action. The request for review must specify the alleged errors or other considerations to which exception is taken.

(b) Appeal from a Commission review may be made to the Trustees of the Association upon grounds of competence or procedure. Such an appeal must be filed with the Executive Secretary of the Association within 60 days of notification of the review decision, citing considerations to justify the appeal. After investigation, the Trustees will either sustain the Commission or remand the case to the Commission for re-evaluation under instructions stipulated in each case by the Board of Trustees.

(c) The respective Commission will report its findings to the Board of Trustees for final decision.

2. NEW ENGLAND APPEAL PROCEDURE

Any institution may appeal from a decision pertaining to its application for membership or its continued membership status made by the Commission by submitting to the Executive Committee of the Association a formal written request for reconsideration of the Commission's decision. The judgment of the Executive Committee in response to the request for reconsideration shall be final.

3. NORTH CENTRAL APPEAL PROCEDURE

1. Requests for reconsideration of decisions of the Association shall be filed with the Executive Secretary of the Association not sooner than

10 days and not more than 30 days following the meeting at which the decisions were made and shall represent official action of the governing bodies of the institutions concerned. The basis for such requests for reconsideration shall be alleged bias, injustice, departure from established procedures, or factual error of sufficient magnitude to warrant reconsideration of the decision. Such allegations shall be supported by evidence in writing, submitted by the institution making the request.

2. The Executive Secretary of the Association shall transmit a request for reconsideration to the Executive Secretary of the Commission concerned who shall submit the request to the administrative committee of that Commission.

3. The administrative committee of the appropriate Commission, or a committee appointed by the Chairman of the Commission which shall report its findings to the administrative committee, shall consider the allegations of bias, injustice, departure from established procedure, or factual error of sufficient magnitude to warrant reconsideration of the decision and shall study the evidence submitted in writing by the institution. The administrative committee shall then submit to the Board of Directors of the Association its report and recommendations together with the allegations and the evidence received from the institution. Thereupon, the Board of Directors of the Association, having considered the allegations, the supporting evidence, and the recommendations of the administrative committee, shall take final action on the request for reconsideration.

4. NORTHWEST APPEAL PROCEDURE

Any member aggrieved by Commission or Association action or decision may appeal any such decision within thirty (30) days thereof to the President of the Association. The President shall either appoint a special Board of Review or remand the controversy to the appropriate Commission or Association for further consideration. Any judgment thus rendered shall be final.

5. SOUTHERN APPEAL PROCEDURE

Should any petition of an applying institution be denied, and should the president of the institution request a hearing to show cause why it should not be denied he may appeal the decision to the Executive Council of the Commission on Colleges at one of its regular meetings. The Executive Council is empowered to review the decisions of all standing committees and may reverse a decision, subject to approval by the Commission on Colleges at its next regular meeting.*

6. WESTERN APPEAL PROCEDURE

a. Accrediting Commission for Junior Colleges

ACJC has established a review procedure, whereby the action of the Commission can be appealed if an institution desires to request such action.

1. If an institution wants to request reconsideration of an action by

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*Recommendation that this be added to the Introduction of Standards has not yet been approved by the Executive Council or adopted. (6-15-70)

ACJC on accreditation or reaccreditation, it shall make the request in writing within sixty days from the date of its notification of such ACJC action.

2. The request is to be made by the chief administrator of the institution, sent to the ACJC Executive Secretary, and shall state the reasons for requesting the reconsideration.

3. On receipt of the request, the ACJC Chairman and Executive Secretary will name a team of two members of the Commission to visit the institution, review the situation, and prepare a report for the Commission at its next meeting. This "Commission review team" shall contact the chairman of the evaluation team so that views of that body may be recognized.

4. The Commission review team has authority to recommend to the Commission action appropriate to its findings. As nearly as possible, it shall base its recommendations on conditions at the institution as they were when the evaluation team visited it.

5. The charge made for the review procedure shall be one-half the cost of a normal accreditation visit.

6. Pending action by ACJC on the report of the review team, the accreditation status of the institution remains that which it was when the institution invoked the review procedure.

7. Action by ACJC following this review procedure shall be final.

b. Accrediting Commission for Senior Colleges and Universities

Within sixty days after a Commission meeting at which a decision has been reached regarding the initial accreditation or the reaccreditation of a college or university, the institution concerned may request the Commission to review the decision at its next regular meeting. The request must be supported by either (a) significant new information not available to the visiting committee or to the Commission at the time of the decision, or (b) a supplement to the institution's earlier reply to the visiting committee report, made before the decision of the Commission was known, which raises substantial issues and is accepted by the Commission. When a review is approved on one or both of these grounds, a new accreditation committee will be formed to visit the institution. One of the members will be chosen from a list of three qualified persons proposed by the institution. While the new accreditation committee is performing its duties and until the Commission acts on its recommendations, the status of the institution reverts to that which it held before the Commission acted on the basis of the recommendations of the previous accreditation committee. The charge to the institution for such a review is the same as that for the usual accreditation visit based on the approved scale of accreditation fees.

APPENDIX D

NORTHWEST ASSOCIATION OF SCHOOLS AND COLLEGES
Roster, Commission on Colleges
1976

Dr. Robert W. Coonrod, Academic Vice President, University of Idaho, Moscow, Idaho 83843 (Chairman, Ex-officio)

Dr. James F. Bemis, Executive Director, Commission on Colleges, 3700-B University Way N.E., Seattle, Washington 98105 (Ex-officio)

Dr. Donald H. Baepler, President, University of Nevada-Las Vegas, Las Vegas, Nevada 89109

Dr. Eleanor Beard, Oregon State Board of Education, 1580 South Skyland Drive, Lake Oswego, Oregon 97034

Dr. Charles E. Blackburn, Professor of English, Washington State University, Pullman, Washington 99163

Dr. Frederick M. Boyle, President, Central Oregon Community College, Bend, Oregon 97701

Dr. Paul E. Bragdon, President, Reed College, Portland, Oregon 97202

Dr. Donna H. Broderick, Academic Director, Community College Division, University of Alaska-Anchorage, Anchorage, Alaska 99504

Msgr. Anthony M. Brown, President, College of Great Falls, Great Falls, Montana 59405

Dr. Fred L. Esvelt, President, Columbia Basin College, Tri Cities, Washington 99301

Dr. Charles J. Flora, Professor of Biology, Western Washington State College, Bellingham, Washington 98225

Dr. Gilbert C. Ford, Vice President for Academic Affairs, Northwest Nazarene College, Nampa, Idaho 83651

Dr. Shirley B. Gordon, Vice President, Highline Community College, Midway, Washington 98031

Mrs. Janet S. Hay, Idaho State Board of Education, 328 Winther Boulevard, Nampa, Idaho 83651

Dr. Roy E. Huffman, Vice President for Research, Montana State University, Bozeman, Montana 59715

Dr. Arthur Kreisman, Dean of Arts and Sciences, Southern Oregon State College, Ashland, Oregon 97520

Mr. Robert G. Leonard, Board of Trustees, Shoreline Community College, 17347 Densmore North, Seattle, Washington 98133

Dr. Ellis E. McCune, President, California State University, Hayward, California 94542

Dr. David L. McKenna, President, Seattle Pacific College, Seattle, Washington 98119

Mr. Jay L. Nelson, President, Utah Technical College at Salt Lake, Salt Lake City, Utah 84107

Dr. Eldon G. Schafer, President, Lane Community College, Eugene, Oregon 97405

Dr. James L. Taylor, President, College of Southern Idaho, Twin Falls, Idaho 83301

Dr. Robert K. Thomas, Academic Vice President, Brigham Young University, Provo, Utah 84602

APPENDIX E

CORRESPONDENT STATUS

1) The Application

The chief academic officer, usually the president, must write to the executive director of the Higher Commission stating the desire of the institution to seek correspondent status.

2) Eligibility Standards

Newly founded or developing institutions of higher education which reflect evidence of basic planning for development of the institutions may apply for correspondent status. No specific standards are listed for eligibility to become a correspondent.

3) Commission Activity

The Institutional Profile

The executive director sends to the institution an outline for an Institutional Profile which the institution must prepare as part of the application. The profile consists of two parts. The first part deals with the history, the philosophy and objectives, the needs of the area to be served, the curriculum, admission standards, the physical facilities which exist or are immediately proposed, the organization chart for the board, the administration, the faculty and students and the proposed sources of income.

The second part of the profile requests basic statistical information such as enrollment trends, student ability, salaries, degrees held by the instructional staff, library holdings, finances, budgets, loan funds and other financial details.

Two copies of the profile are sent to the executive director who studies it carefully. If the profile is complete and in order, a one-day visit to the institution is arranged. He or a member of the commission will evaluate the plans and the institution if it is in operation. The institution is charged the actual expenses of the evaluator plus a $50 filing fee. The examiner, on the basis of his observations, recommends to the chairman of the commission his opinion of the proper action and in consultation with him either recommends approval or disapproval of the application. The recommendation, if approval is granted, is presented at the next meeting of the Higher Commission. The decision of the commission is final. Appeal procedures are provided.

APPENDIX F

REGIONAL ACCREDITATION QUESTIONNAIRE

From your experience with or knowledge of the Commission on Colleges of the Northwest Association of Schools and Colleges:

1. Do you favor or not favor the regional nature of the accrediting association (as opposed to a national or statewide jurisdiction)?__________

    1.a Why or why not?______________________________
    ____
    ____

    1.b How important do you consider the issue of regionalism to be?______
    ____

    1.c Do you favor the proposed merger of the Northwest and Western Associations?______________________________

    1.d Why or why not?______________________________
    ____
    ____

    1.e How important do you consider the merger issue to be?__________
    ____
    ____
    ____

2. Do you favor public (non-institutional) representation on the Commission itself?______________________________

    2.a On evaluation teams?______________________________

    2.b Why or why not?______________________________
    ____
    ____

    2.c Should these public representatives be other than members of institutional boards?______________________________
    ____
    ____

    2.d Why or why not?______________________________
    ____
    ____

    2.e How important do you consider the issue of public representation to be?______________________________
    ____
    ____

3. Do you favor the retention of the candidate classification as currently defined and implemented by the Commission?

3.a Why or why not?

3.b If no, what changes in candidacy would you propose?

3.c How important do you consider the issue of candidacy to be?

4. Do you regard accreditation status as an important criterion for transfer of credit between institutions and acceptance of degrees?

4.a Why or why not?

4.b How important do you consider this transfer issue to be?

5. Can regional accreditation as practiced by the Northwest Association provide an effective mechanism for preventing or correcting consumer abuses?

5.a Why or why not?

5.b How important do you consider the issue of consumer protection to be?

6. Do you favor legislation to establish a state licensing/approval function for postsecondary educational institutions (proprietary and non-profit) wishing to operate in the state?

6.a Why or why not?

6.b How important do you consider the issue of state licensing to be?

7. How satisfied are you with the provisions of due process (notice, appeal, etc.) observed by the Commission in making determinations of candidacy and accreditation?

7.a Give examples that support your opinion.

7.b What additional or alternative provisions for due process would you suggest?

7.c How important do you consider the issue of due process to be?

8. Are there accreditation-related issues, overlooked in the draft report, that you feel are important?

APPENDIX G

Washington Friends of Higher Education
235 Pioneer Building, 600 First Avenue, Seattle, Washington 98104 Phone (206) 624-9093

November 3, 1976

Mr. Patrick Callan
Executive Director
Council for Postsecondary Education
908 East Fifth St.
Olympia, Washington · 98504

Dear Pat:

Thank you for sending us a copy of the Draft Report on Regional Accreditation. The private colleges are concerned that this report represent a real effort toward quality higher education.

Therefore I hope that we may venture to make a couple of suggestions which stem from our concern for quality higher education:

(1) We strongly recommend that out-of-state institutions offering educational programs and courses in Washington State be required to seek and obtain accreditation from the Northwest Association of Secondary and Higher Schools. After all, if educational programs are to be offered in this state, they should first be reviewed and judged by that body which accredits educational programs offered by institutions in the state.

(2) It is critical to maintain definite and substantial candidacy guidelines for regional accreditation, lest this become merely an ineffectual, pro forma process. We are deeply concerned about the effectiveness and selectivity of the accrediting process.

Please accept these concerns expressed in the interest of quality higher education.

Sincerely,

David M. Irwin
Executive Vice President

cc: Dr. Philip Phibbs

APPENDIX H

Revised proposal as approved
by the Far West Council on
Accreditation, September 13, 1976

ARTICLES OF INCORPORATION
OF
NORTHWEST-WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

KNOW ALL PERSONS BY THESE PRESENTS:

We, the undersigned, have this day voluntarily associated ourselves together for the purpose of forming a non-profit charitable corporation under the laws of the State of Washington, and we hereby certify as follows:

FIRST: This Association is a confederation organized pursuant to the General Non-profit Corporation Law of the State of Washington.

SECOND: The name of this nonprofit corporation shall be: Northwest-Western Association of Schools and Colleges.

THIRD: The specific purposes for which this confederation is formed are to maintain and improve the quality of education in schools, colleges, and universities within the confederation's territory; and to provide an alliance of accreditation commissions whose purpose is to:

1. Receive and publish commission actions on accreditation status of institutions.
2. Increase cooperation among the schools, colleges and universities within the territory they serve;
3. Enhance effective working relationships with other educational organizations and accrediting agencies;
4. Protect the interests of the educational consumer and of legitimate educational institutions against fraud or misrepresentation;
5. Protect the integrity and autonomy of educational institutions;
6. Encourage educational research aimed at improving methods and techniques of self-study and accreditation;
7. Represent and interpret accreditation in the region served;
8. Utilize any other appropriate means in furtherance of its charitable purposes; and
9. Enhance joint action of member commissions in order to accomplish their purposes.

This confederation shall have the power to do all necessary or incidental acts in the furtherance of its charitable purposes.

FOURTH: The principal office for the transaction of the business of this confederation is located in the County of **King**, State of **Washington**.

FIFTH: The directors shall be known and designated as trustees. The names and addresses of the persons who are to act in the capacity of trustees of this confederation, until the selection of their successors, are:

Name Address

(To be the eight designated by the five commissions)

SIXTH: The number of trustees of this confederation shall be ten (10) unless and until changes by the adoption of an amendment to these Articles or by an appropriate Bylaw are made.

SEVENTH: The authorized number and qualifications of members of this confederation, the different classes of membership, and the voting and other rights and privileges of members shall be as set forth in the Bylaws of this confederation.

EIGHTH: All of the properties, monies, and assets of this confederation are irrevocably dedicated to charitable purposes and shall not inure to the benefits of any private individual. In the event that this confederation shall be dissolved at any time, then all the properties, monies, and assets of this confederation shall be transferred exclusively to and become the property of such nonprofit funds, foundations, or corporations as are selected and designated by the Board of Trustees of this confederation, and which have established their tax exempt status under Section 501(c)(3) of the Internal Revenue Code of the United States as it now exists or may subsequently be amended.

PROPOSED BYLAWS
OF
NORTHWEST-WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

ARTICLE I

NAME AND PURPOSE

The name of this confederation and the purposes for which this confederation is formed shall be as provided in its Articles of Incorporation.

ARTICLE II

REGION SERVED

The Accrediting Region served by this confederation shall encompass all territory previously served by the Northwest Association of Schools and Colleges and the Western Association of Schools and Colleges. This Region comprises the states of Alaska, California, Hawaii, Idaho, Montana, Nevada, Oregon, Utah, Washington, and areas in the Pacific Basin previously served by the Western Association of Schools and Colleges. This confederation may carry out accrediting functions in other states within the Western United States and other areas within the Pacific Basin on the approval thereof by the Board of Trustees of this confederation.

ARTICLE III

MEMBERSHIP

1. Qualification

(a) All institutions accredited by the commissions of the confederation are institutional members and eligible to participate in the annual meeting of the institutional members.

(b) All members of the Board of Trustees shall be corporate members of the confederation and shall become such by serving as members of the Board of Trustees. There shall be no corporate members other than those serving as members of the Board of Trustees. The death, resignation, or removal of any trustee shall automatically terminate his or her individual membership in this confederation.

2. Annual Meeting

The annual meeting of the Institutional Members and of the Board of Trustees of this confederation shall be held each year at such day, hour, and place as may be designated by the Board.

3. Regular Meetings, Special Meetings, Notices, Quorum, Voting, Validation of Transactions

Provision of these Bylaws governing the Board of Trustees shall apply here and govern their regular meetings, special meetings, notices, quorum, voting requirements, validation of transactions and action. There shall be no voting by proxy.

ARTICLE IV

BOARD OF TRUSTEES

1. Responsibility

Except as otherwise provided by the Articles of Incorporation or by the Bylaws, the management of the affairs of this confederation shall be vested in the Board of Trustees.

2. Number and Composition

There shall be a Board of Trustees consisting of ten (10) persons, representative of the constituent accrediting commissions and the general public served by this confederation. Initially the Board of Trustees shall be composed as follows:

(a) Two persons designated by the Commission on Colleges of the Northwest Association of Schools and Colleges;

(b) Two persons designated by the Commission on Schools of the Northwest Association of Schools and Colleges;

(c) Two persons designated by the Commission on Schools of the Western Association of Schools and Colleges;

(d) One person designated by the Accrediting Commission for Junior Colleges of the Western Association of Schools and Colleges;

(e) One person designated by the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges; and

(f) Two public representatives selected by the remaining members of the Board of Trustees at its organizational meeting. One public representative shall be from the region of the former Northwest Association of Schools and Colleges and the other from the region of the former Western Association of Schools and Colleges.

Should there be a change in the structure, name, or number of the accrediting commissions provided for in Article VIII, the principle of equal geographic representation and equal number of school and college representatives on the Board of Trustees, as indicated in the foregoing provisions, shall be maintained.

3. Election

Accrediting commissions affiliated with this confederation in accordance with Article VIII shall elect trustee commission representatives in any manner they shall determine. Within seven (7) days following such election, and no later than thirty (30) days prior to the organizational meeting each constituent accrediting commission shall forward in writing to the confederation the names of the elected trustee commission representatives. Each such trustee commission representative shall be a member of the Governing Board of his or her respective accrediting commission at the time of his or her appointment.

4. Term

Each trustee representing a constituent commission, in accordance with Sections 2 and 3 of the Article, shall hold office for a term of three (3) years, or until his or her successor has been selected or appointed, with such term to begin at the commencement of the organizational meeting following appointment by his accrediting commission. Trustee representatives from the accrediting commission shall be elected on a staggered basis, with the first trustees appointed for terms of one, two and three years, according to a formula to be provided by the Board of Trustees. No such trustee shall serve more than two consecutive three-year terms of office.

The terms of office as trustee of the public representatives shall be three (3) years, with the first public representatives to be appointed for two (2) and three (3) year terms, respectively, by lot. No such trustee shall serve more than two consecutive three-year terms of office.

5. Vacancy and Removal

Each trustee representing a constituent accrediting commission shall serve at the pleasure of his or her accrediting commission and may be removed at any time by the accrediting commission, which removal shall become effective on written notice thereof to this confederation. Should any such trustee representative be removed from office, or if his or her office shall be vacated for any reason, the vacancy shall be filled by the appointing accrediting commission, as soon as is practicable.

Any public trustee may be removed from office by a majority vote of the trustees of this confederation at a meeting of the trustees at which a quorum is present. In the event any one, or more, of the public trustees may be so removed, new public trustees may be elected at the same meeting to fill the unexpired term or terms of the trustees so removed. Any vacancy in the office of public trustee shall be filled by remaining members of the Board, even though less than a quorum. A trustee appointed to fill such vacancy shall be appointed for the unexpired term of his or her predecessor in office.

6. Powers and Duties

The Board of Trustees, in furtherance of its responsibilities, shall have the following powers:

(a) To receive and note actions of the respective commissions with regard to accreditation status of schools, colleges, and universities in the geographical area served:

(b) To establish a review and appeals procedure beyond those provided by each commission to provide opportunity for aggrieved institutions to be heard, and, if appropriate, receive redress, but not to include monetary compensation;

(c) To encourage the development of appropriate policies and procedures and of close collaboration among and between the several commissions and accrediting associations in other regions;

(d) To represent the region in relations with other educational or governmental agencies;

(e) To adopt a budget annually and levy on each commission equally a charge sufficient to cover the necessary expenses of the confederation;

(f) To provide for the merger of consenting commissions; and

(g) To do all other things appropriate to carry out the purpose of this confederation in furtherance of its charitable status.

7. Voting Rights

Each trustee shall be entitled to one vote on all matters before the Board of Trustees.

8. Organizational Meetings.

As soon as reasonably practicable, and within thirty (30) days after each annual meeting of the confederation, the Board of Trustees shall meet for the purpose of organizing the Board, the election of officers, and the transaction of such other business as may come before the meeting.

9. Regular Meetings.

The annual meeting of the Board of Trustees shall be held at such time and place as the Board of Trustees shall determine.

10. Special Meetings.

Special meetings of the Board of Trustees for any purpose shall be called by the Secretary upon the request of the President, or any three (3) or more trustees.

11. Notice of Meetings.

Written notice of the time and place of any organizational meeting, regular meeting, or special meeting shall be sent to each Trustee. Such notice shall be given at least five (5) days prior to the time of holding the meeting.

12. Quorum

A majority of the members of the Board of Trustees shall constitute a quorum at any meeting of the Board. The act of the majority of all trustees is required to be considered an act of the Board of Trustees.

13. Place

The Board of Trustees shall hold its meetings at the office of the confederation, or such other place within the region served, as the President of the trustees requiring the meeting may designate.

ARTICLE V

OFFICERS

1. Officers

The officers of the confederation shall be selected from the Board of Trustees and shall consist of a President and Vice President. Each officer shall have the powers and duties as are set forth for his or her respective office in Robert's Rules of Order, together with such other powers and duties as may be designated by the Board of Trustees from time to time; specifically, the President shall be the official spokesperson for this confederation representing the confederation, in accord with policy established by each of the accrediting commissions. Except as otherwise provided in Article VI, regarding the Executive Secretary-Treasurer, each officer shall serve without compensation.

2. Election

The officers of the confederation shall be elected biennially. They shall be nominated by the Board from its own membership and elected at the annual meeting of institutional members of the confederation. A vacancy in any office because of death, resignation, removal, disqualification or otherwise may be filled for the unexpired term at any meeting of the Board of Trustees.

ARTICLE VI

EXECUTIVE SECRETARY-TREASURER

The Board of Trustees shallappoint an Executive Secretary-Treasurer. The Executive Secretary-Treasurer shall serve at the pleasure of the Board of Trustees. He or she shall have the duties and powers set forth in these Bylaws, in any written agreement by and between the Board of Trustees and the Executive Secretary-Treasurer, or which are incident to the office of the Executive Secretary-Treasurer, or as may be prescribed by the Board of Trustees from time to time. The Executive Secretary-Treasurer shall have the general responsibility, under the direction of the Board of Trustees, for the day to day supervision and control of the business and affairs of this confederation. The Executive Secretary-Treasurer shall serve as the Secretary of the Board of Trustees and shall maintain a complete file of minutes of the confederation meetings and of the Board of Trustees.

The Executive Secretary-Treasurer shall receive from the executive directors of the constituent accrediting commissions the lists of accredited and candidate institutions at least once every year. The Executive Secretary-Treasurer may serve as the executive director for one of the constituent accrediting commissions. The compensation for the Executive Secretary-Treasurer shall be fixed by the Board of Trustees annually.

ARTICLE VII

ACCREDITATION ACTIONS

Any university, college, secondary, or other school shall have its accreditation status determined by action of the appropriate accrediting commission. Such actions shall be reported to and noted by the Board of Trustees. Any such status (candidacy, accreditation, continuation of candidacy or of accreditation or other status) shall cease whenever an institution (after exhausting available due process opportunities) is removed by the appropriate commission from the lists of the confederation, fails to pay its annual or special fees or charges for visiting committees in the amounts and by the dates set by the appropriate commission, or notifies the appropriate commission of its desire to discontinue its accreditation, candidacy, or other status.

ARTICLE VIII

ACCREDITING COMMISSIONS

1. The initial accrediting commissions of the confederation are as follows:

(a) Commission on Schools of the Northwest Association of Schools and Colleges;

(b) Commission on Colleges of the Northwest Association of Schools and Colleges;

(c) Accrediting Commission on Schools of the Western Association of Schools and Colleges;

(d) Accrediting Commission for Community and Junior Colleges of the Western Association of Schools and Colleges; and

(e) Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges.

Each accrediting commission shall establish its own bylaws, rules, regulations, and standards; its own composition and process by which commission members are selected; and each commission shall present these materials and any amendments to the Board of Trustees. All such bylaws, rules and regulations and processes in effect at the time of incorporation of this confederation are herewith accepted. Any and all programs, policies, and working documents of each accrediting commission shall be governed by, and be consistent with, the Articles of Incorporation and Bylaws of this confederation.

2. Finance

Each Commission shall be autonomous from all other commissions regarding its finances and shall establish fees and charges sufficient to cover its reasonable and necessary expenses.

3. Duties, Responsibilities and Authority

The duties, responsibilities and authority of each commission as represented in the confederation shall be:

(a) To develop such policies as are appropriate for its class of institution;

(b) To employ an Executive Director and such other staff as may be necessary to perform the duties prescribed by the commission, including:

(1) Keeping a record of the commission proceedings;

(2) Attending to all necessary correspondence;

(3) Collecting annual dues of respective members and other monies that may be due the commission; and

(4) Paying all obligations of the commission including its share of Association expenses.

(c) To provide all materials and forms necessary for its work, to communicate with institutions accredited by each commission or seeking candidacy, accreditation, or other status, and to take action on the recommendations for additional action which are presented in due form. It shall be the duty of each commission to assist the confederation in the advancement of education;

(d) To grant candidacy or other status or to accredit the schools and institutions which present applications in proper form and which are found by the commission to meet prescribed standards, to establish the terms of accreditation, and to establish the fiscal and accreditation year, consistent with Article XII,2;

(f) To perform such other duties and activities as may be appropriate to its function, consistent with these Bylaws.

4. Commission Reports

Each commission shall promptly report to the Board of Trustees of this confederation its actions on accreditation status of institutions.

5. Executive Director

The executive director of each of the several accrediting commissions shall maintain a record of the actions and decisions of the commission, and shall be responsible for such other matters as the commission may delegate. Following each meeting of the accrediting commission at which accreditation decisions are made, the executive director thereof shall promptly notify the Executive Secretary-Treasurer of the confederation of any and all changes in the lists of accredited and candidate institutions submitted by each accrediting commission, in accordance with Article VII. The Executive Secretary-Treasurer shall present a summary of such actions to the institutional membership at the annual meeting.

ARTICLE IX

APPEALS

1. Hearing Board Composition

The confederation Board shall elect annually and convene as necessary a confederation Hearing Panel which shall be established for the purpose of deciding appeals by any institution against the decision of any of the confederation commissions concerning the denial or withdrawal of accreditation or other recognized status. This Panel shall consist of twenty persons as follows; (1) five from schools; (2) five from junior or community colleges; (3) five from senior colleges and universities; and (4) five lay members of governing boards. None of the twenty shall be a current member of an accrediting commission.

(a) The Hearing Board shall consist of five persons, including at least one person from each of the above categories, and not more than one from any single state, selected on a random basis from the Hearing Panel and appointed, after such selection, by the confederation president. None of those selected shall have been involved in the accreditation process which resulted in the appeal. The Hearing Board shall elect its Chairman from its own membership.

(b) Hearing Board members to replace those who are absent or have a conflict of interest shall be selected on the same random basis and appointed by the confederation president from the remaining members of the Hearing Panel.

(c) An institution making an appeal shall deposit at the time it files its appeal an amount to be established annually by the confederation with the Secretary-Treasurer of the confederation to cover the necessary costs of the hearing. Unused funds will be returned to the institution.

2. Notice and Hearing

If an institution, after availing itself of any review or appeal proceedings of its appropriate commission, still believes itself aggrieved by that commission's denial or withdrawal of candidacy or accreditation, its governing board may appeal such action within thirty days of receipt of notice thereof to the president of the confederation through the appropriate commission's executive director. During the period up to and including the appeal, the institution's status with the commission shall remain the same as it was prior to the decision being appealed.

(a) The president of the confederation shall then arrange a hearing at the earliest practicable date for the representatives of the institution before the confederation's Hearing Board, established for this purpose as prescribed in Article IX, Section 1 of these Bylaws.

(b) This hearing shall be informal and conducted under rules and procedures established by the confederation Board of Trustees. Those testifying will not be placed under oath. Legal counsel may be present as advisors but they will not be expected to conduct the case as in a formal judicial proceeding.

(c) At least ten (10) days before the time set for the hearing of such an appeal, the president (or secretary-treasurer) of the confederation must cause notice of the time and place of the hearing to be mailed by registered or certified mail, return receipt requested, to the chairperson or president of the governing board of the institution with a copy to the chief executive. Proof of notice must be made at the hearing.

(d) Subject to limitations set forth below, representatives of the institution will have an opportunity to present written documents, other evidence on the institution's behalf, oral testimony and arguments. Representatives of the appropriate Commission and of the evaluation team will have a similar opportunity to present evidence, oral testimony and arguments on the Commission's behalf.

(e) The Hearing Board, in addition to considering evidence adduced at the hearing, will also consider the institution's Self-Study report, the evaluation team report, and all other materials relied upon by the Commission in reaching the decision which is being appealed.

(f) The appeal shall be based on one or more of the following grounds: (1) there were errors or omissions in carrying out prescribed procedures on the part of the evaluation team and/or the Commission; (2) there was demonstrable bias or prejudice on the part of one or more members of the evaluation team or Commission which materially affected the Commission's decision; (3) the evidence before the Commission prior to and on the date when it made the decision which is being appealed was materially in error; or (4) the decision of the Commission was not adequately supported by the facts before it at the time.

(g) The appeal shall be heard on the record and confined to actions taken by the institution and the Commission up and through the date of the Commission decision which is being appealed. Only evidence and documentation which was before the Commission on that date may be introduced.

(h) The Hearing Board shall make its decision on the basis of the admissible evidence and arguments presented to it at the hearing.

> (1) If the Board finds for the institution on one or more grounds (1) through(3) of Section 2 f above, the Board shall remand the case to the appropriate Commission for reconsideration.
>
> (2) If the Board finds for the institution on ground (4) of Section 2 f above, it shall grant the appeal and direct the Commission to take appropriate action at its next meeting.

(3) If it finds against the institution on any of the four grounds in Section 2 f above, it shall deny that portion of the appeal which is based on that ground.

(i) At the conclusion of its deliberations, the Hearing Board shall issue its decision and the reasons therefor and inform, by registered or certified mail, return receipt requested, the president of the confederation, the chairperson of the governing board of the institution and the executive director of the Commission concerned. Such decision shall be final.

ARTICLE X

ANNUAL MEETING OF THE CONFEDERATION

The officers shall arrange for annual meetings to carry on professional activities, to elect the officers of the confederation, to receive reports from the Board of Trustees and to approve changes in the Bylaws in accordance with Article XIV. At the annual meeting of the confederation, each accredited institution shall be considered an institutional member thereof and shall be entitled to one official voting representative. Delegates may also be designated by state departments of education and statewide coordinating agencies in accordance with rules to be established by the confederation. Other educational or education-related agencies may be invited by the commission to be associate members with or without vote also in accordance with rules to be established by the confederation. Honorary memberships without vote may be established. A quorum at annual meetings of the institutional members shall be fifty officially designated delegates.

ARTICLE XI

COMMITTEES

There shall be such standing committees and special committees as the Board of Trustees shall, from time to time, establish with such duties and responsibilities as the Board shall designate. The president of the confederation shall have the power to appoint the chairman and members of such committees, subject to the approval of the Board of Trustees.

ARTICLE XII

GENERAL PROVISIONS

1. Offices

This confederation shall have and continuously maintain a registered office in a city and state as determined by the Board of Trustees.

2. Fiscal Year

The fiscal year of the confederation shall end on the 30th day of June of each year.

ARTICLE XIII

AMENDMENTS TO THE BYLAWS

These Bylaws may be amended or repealed or new Bylaws may be adopted by a majority vote of the membership at the annual meeting of the confederation upon recommendation by the Board of Trustees. The Board of Trustees shall recommend changes in the Bylaws only after concurrence by all of the constituent accrediting commissions.

NOT A PART OF THE BYLAWS

ENABLING ACTION

Within ninety (90) days after ratification of the Proposed Articles of Incorporation, these Bylaws and the proposed incorporation of the new confederation of the Northwest-Western Association of Schools and Colleges by all five (5) accrediting commissions and the governing bodies of the Northwest Association of Schools and Colleges and the Western Association of Schools and Colleges, the Board of Trustees of this confederation shall convene to plan the orderly inauguration of activities, including the designation of officers to serve in an acting capacity until the first annual meeting.

APPENDIX I

FEDERATION OF REGIONAL ACCREDITING COMMISSIONS OF HIGHER EDUCATION

INTERIM STATEMENT ON ACCREDITATION AND NON-TRADITIONAL STUDY

Accreditation procedures for non-traditional programs should encourage innovative and imaginative approaches to providing quality education whether in new institutions or in those already accredited. The accrediting process generally should move toward assessment of the results of education rather than its processes, and developments in non-traditional studies and degrees provide opportunities to do so. At the same time, the Federation emphasizes that accreditation is concerned with institutional improvement and that attention to outcomes only, without considering the relation of these to the environments and educational processes, would be of little assistance to either traditional or non-traditional programs in raising questions and providing suggestions for improvement.

The Federation believes that, at this early stage in the development of non-traditional degree programs, the principles, policies, and procedures specified for accreditation must be flexible and of an interim nature. As the nature of innovative developments becomes clarified and experience is gained in working with them, accreditation policies and procedures can be adjusted to attain a uniform approach to the traditional and the innovative in such manner that the better procedures of each are called to the attention of both. In this context, the statement of policies and principles presented here is tentative and interim. It is a working set of guidelines which will require continued monitoring, clarification, and revision as experience in their application evolves.

General Policies

1. Accreditation will be considered only when a number of individuals have been granted or have qualified for a degree by various non-traditional patterns indicated. Consideration of students' completed programs and student reactions are deemed indispensable to accreditation.

2. Accreditation procedures and criteria should be comprehensive, flexible, and fair. Evaluation committees should include persons who have experience in non-traditional programs and/or who are sufficiently conversant and understanding to review innovations competently.

3. An institution which, by the nature of its program, abandons or renders non-functional traditional criteria and mechanisms of review and control aimed at assuring quality must accept responsibility for indicating alternative ways in which quality will be assured.

Guidelines

1. When degrees based heavily on non-traditional patterns of study are offered, evidence will be required that the degrees are awarded on the basis of definite criteria and demonstrated competency commensurate with the level and nature of the degrees.

2. The appraisal, evaluation or examination procedures of an institution must be conducted with a high degree of objectivity, with due regard for

maintenance of honesty and security, and with explicit statements of criteria and standards for judging satisfactory performance. The learner's self-appraisal of the worth of an experience is a valuable but not sufficient basis for awarding credit or a degree.

3. Publicity statements to prospective students must be factual. For example, actual services provided must be consistent with publicity. This will require monitoring adjunct professors to assure that they fulfill their commitments.

4. To protect the integrity of the faculty-institution work relationship and avoid circumstances involving conflict of interest, policies regarding the amount of outside work for pay and safeguards surrounding use of institutional resources and facilities for their intended purposes are required. The relationship of full time faculty serving as adjunct faculty or program advisers and using the learning resources and facilities of their full time employer for programs of study offered by other institutions (accredited or unaccredited) should conform to their institution's policies and standards on these matters.

5. The conditions and circumstances of subcontracts with adjunct faculty in the community, with museums, art institutes, libraries, government agencies, foreign study institutions, and other diverse learning facilities should be made explicit and should be in conformity with the policies and standards of the institutions on such matters. They should be accompanied by a description of the means to be used for documenting and evaluating the work done by the student in reference to the objectives of the programs of study.

6. The conditions and circumstances of subcontracts by unaccredited institutions with accredited institutions for use by students of their learning resources, facilities, and degree-granting prerogatives should be made explicit. They should also be in conformity with the usual institutional policies and procedures safeguarding their intended use, and with the Federation's guidelines on "Contractual Relationships with Non-Regionally Accredited Organizations".

The concern here is both with the placement of responsibility, the use and availability of resources, and the relation between student charges, services rendered, and benefits acquired.

* * * * * *

NOTE: Questions about these principles and guidelines should be directed to the office of the appropriate regional accrediting commission.

Approved by the Council
March 14, 1973

APPENDIX J

FEDERATION OF REGIONAL ACCREDITING COMMISSIONS OF HIGHER EDUCATION

POSTSECONDARY EDUCATIONAL PROGRAMS CONDUCTED BY ACCREDITED OR CANDIDATE INSTITUTIONS ON MILITARY BASES

The Federation of Regional Accrediting Commissions of Higher Education is pleased to note that the military services are very much aware of the critical need for well educated manpower, and fully endorses the development of educational programs on military bases designed to provide for the personal and professional growth of personnel through educational courses and programs in cooperation with accredited and candidate postsecondary institutions.

Institutions are encouraged to cooperate with the military services in designing appropriate courses and programs for both military personnel and also such military-related or civilian personnel as it may be considered feasible to accept. In establishing courses or programs, institutions should recognize that special considerations frequently must be made; e.g., courses designed for the undergraduate on a college campus or for professional preparation in an academic discipline may not adequately meet the needs or capitalize on the experience of military personnel. The usual fixed requirements of residence and traditional methods of accumulating credits may fail to allow for the unique circumstances of the military person. Hence, it is the Federation's view that an institution offering such courses, while holding to the basic quality essential to good educational programs, should feel free to adapt methods, policies, and procedures to the regimen and conditions under which the military student must perform his duties and pursue his studies.

Providing educational opportunities for interested personnel on military bases is a dual responsibility. Certain guides and requisites can be established which may provide both incentive and direction for officers of the military in positions of responsibility on base. Likewise there are helpful guides that might provide direction for those from the college campus responsible for such services. Successful programs in these situations will not be realized unless there is mutual understanding, a sharing of responsibilities, and a marshaling of resources essential for such offerings.

I. Guides and Responsibilities of Institutions

A. Programs offered should relate to the purposes and adhere to the educational standards of the institution.

Provision should be made for students to work toward completion of appropriate programs offered by the institution. Without compromising the principle that quality will be equivalent to that on campus, course offerings might be more flexible or non-traditional than those required of the campus student. Thus the educational goal of the military base student might be given special consideration within the general graduation requirements of the institution without depreciation of standards. Although institutions should refrain from offering work unrelated to either their mission or resources, they may provide service or cultural courses without credit when such experiences can be of personal worth or upgrade competencies required of the military person.

B. In organizing and administering base programs, institutions should take into consideration the uniqueness of military situations.

The staff member assigned the responsibility of representing an institution in its military base effort must recognize the unique demands of the situation. He must realize that the first demand upon the base personnel is a military commitment, and arrangements for such individuals must fit into this demand. Although organization and administration practices need not duplicate or conform to campus routines, appropriate standards should be maintained.

C. Student personnel policies and services should be such as to facilitate the success of a program on a military base.

Admission requirements should reflect the demands of postsecondary level studies and degree requirements, and at the same time take into consideration the student's background in terms of equivalencies. Registration procedures should be accommodated to the conditions under which the military work, and counseling services provided by relevantly prepared and experienced individuals. Special provisions should be made for program advising so students may know requirements as well as make adjustments in terms of their own educational goals. Adjustments may need to be made in residence requirements and/or the substitution of courses for transfer credit or degree purposes. Provision should be made for the possibility of advanced placement or credit by examination or evaluation.

D. Both faculty and instruction should be of recognized quality.

For military base education programs, the faculty are drawn from the cooperating institution, the military base staff, and from other institutions. Qualified specialists without institutional affiliation may also be employed. Instructors must be professionally competent in regard to specific preparation and recency of involvement in the field. When participating institutions employ faculty from other institutions on a part-time basis, it is recommended that they do so with permission from the faculty members' full-time employer; this will avoid the danger of excessive overloads.

The quality of instruction should be comparable to that on campus, with the same degree of concern for teaching tools and learning resources. Necessary library materials must be available or accessible. Special provisions may be needed for the completion of course work when students are called from base. Regardless of departures from campus practice, grades should not be given until students meet all course requirements.

E. Integrity among institutions offering programs on a single base is essential.

Institutions placed in competition with each other in making bids to provide services must guard against the erosion of quality of instruction. To avoid negative aspects of competition, several participating institutions on a base should consult among themselves and with the military education services officer. In all deliberations and negotiations, it is expected that a high degree of integrity will be maintained.

II. Guides and Obligations of the Military

A. The military should not hesitate to initiate negotiations for the purpose of providing educational programs on base.

When postsecondary educational opportunities are not being provided and when personnel on base express an interest in them, military officials should initiate the action necessary for securing such programs. The leadership should first assess and identify the types of programs and services desired before approaching an institution. It is always helpful to know at the outset precisely what is desired, the approximate number of students that are likely to be involved, and the resources which the base might be able to provide. Education officers should be open in making needs known to interested institutions and in inviting proposals for programs. Memoranda of understanding or contracts should be negotiated directly between military bases and participating institutions. Where possible, it is recommended that such memoranda of understanding or contracts run for more than one year to assure program stability. Perhaps bases could work toward standardization of contracts and thus insure greater consistency in the services provided by an institution.

B. A joint meeting of both institution and base leadership should occur early.

After the educational needs of base personnel are determined there should be a joint exploration and planning session of base and institution representatives. Such a meeting should define the needs, identify essential resources, describe the general nature of programs desired, and define the specific responsibilities of all parties. Written agreements should be reached prior to initiation of the program to guide both the base and the participating institution in carrying out the program.

C. The military will have responsibility for supplying certain essential resources.

In addition to identifying programs desired, the number of persons involved, and the costs, the military should expect to provide certain essentials for such programs on base:

1. Suitable and adequate classrooms
2. Space and facilities for a library or learning center
3. Adequate learning resources to support the program
4. Laboratory space and essential equipment for courses requiring laboratory experiments
5. Other equipment and supplies (e.g., typewriters, business machines, etc.) essential to the courses offered.

It is the responsibility of the educational institution to notify the military base of additional or extraordinary needs sufficiently in advance to make it possible for the base to fulfill the request.

The military in most instances will be expected to provide certain initial funds for starting the service.

D. The military must give full support and backing to the program once it is initiated.

No program will succeed without the continuing support of the post commander, his staff, and the highest officials of the respective service branch. A postsecondary program will also need the attention of an educational officer who is a qualified educator and is given time and staff to manage and evaluate the program and provide essential academic advisement. The educational officer will need the full support of all base officials. The success of such programs is highly dependent upon the experience, leadership, and resourcefulness of such an individual.

[illegible]. There is need for greater uniformity of policy and practice among the various branches of the military.

It has been noted that differences exist in both policy and practice between various branches of the service. FRACHE urges that steps be taken toward the following:

1. Greater commonality in administrative organization of educational programs throughout the services.
2. More common or comparable scales of tuition support
3. More common agreement on what constitutes adequate classroom space and equipment.

Greater uniformity of commitment on the part of the various branches could do much to increase comparability of programs and services among military bases, and would improve efficiency and reduce the administrative burden on institutions providing educational programs to more than one base.

F. On bases where non-military personnel are permitted to take courses, it is understood that the first responsibility in terms of space and instructional services is to the military student. However, the inclusion of community people on a space-available and self-paid basis may be beneficial to all parties concerned and is encouraged.

III. The Evaluation of Educational Programs on Military Bases

A. Educational programs conducted by accredited or candidate postsecondary institutions on a military base should be evaluated by the appropriate regional accrediting commission in conjunction with an institutional evaluation.

Although informal evaluations may be made by military education staff, it is not appropriate for the military to engage in formally evaluating the programs of an accredited postsecondary institution. It is recommended, however, that appropriate military educational personnel confer with the institution in doing the relevant part of its self-study. An evaluation team may wish to confer with the military regarding the support, resources, and effectiveness of a given program.

B. If an accredited institution offers educational programs on a military base within another accrediting region, the evaluation should be conducted jointly by the affected commissions with primary responsibility vested in the parent commission. In the case of overseas programs conducted outside the United States or its possessions, the evaluation should be conducted by the appropriate regional commission.

C. Those responsible for postsecondary military base programs will be cognizant of and generally expected to meet the appropriate military, state, regional accrediting commission, and FRACHE guidelines for operation of the programs.

Consortia Arrangements

Where two or more institutions are joined together in consortia to provide educational programs on military bases certain common administrative arrangements and educational policies need to be agreed upon. This can be handled by a consortium board with appropriate representation from each of the participating institutions and the military. Such matters as calendar, admissions, course and degree requirements, transfer of credits, and tuition should be developed.

From the outset the appropriate regional accrediting commission should be notified of and involved in the development of the consortia. Evaluation of the consortia educational program will be in conjunction with the evaluation and accreditation process with each participating institution. Consortia arrangements will not be independently evaluated for separate accredited status.

Approved by the Council
October 24, 1973

APPENDIX K

FEDERATION OF REGIONAL ACCREDITING COMMISSIONS OF HIGHER EDUCATION

INTERIM GUIDELINES ON CONTRACTUAL RELATIONSHIPS WITH NON-REGIONALLY ACCREDITED ORGANIZATIONS

No postsecondary educational institution accredited by a regional institutional accrediting commission can lend the prestige or authority of its accreditation to authenticate courses or programs offered under contract with organizations not so accredited unless it demonstrates adherence to the following principles:

1. The primary purpose of offering such a course or program is educational. (Although the primary purpose of the offering must be educational, what ancillary purposes also provide the foundation for the program or course such as auxiliary services, anticipated income, and public relations?)

2. Any course offered must be consistent with the institution's educational purpose and objectives as they were at the time of the last evaluation. If the institution alters its purpose and objectives, the regional commission must be notified and the Federation policy on substantive change applied. (How does the institution define the specific relationship between the primary and ancillary purposes and the contracted service and how does it demonstrate its capability to attain these purposes?)

3. Courses to be offered and the value and level of their credit must be determined in accordance with established institutional procedures, and under the usual mechanisms of review.
(What evidence exists that established institutional procedures have been followed?)

4. Courses offered for credit must remain under the sole and direct control of the sponsoring accredited institution, which exercises ultimate and continuing responsibility for the performance of these functions as reflected in the contract, with provisions to assure that conduct of the courses meets the standards of its regular programs as disclosed fully in the institution's publications, especially as these pertain to:

- a. recruitment and counseling of students
- b. admission of students to courses and/or to the sponsoring institution where credit programs are pursued
- c. instruction in the courses
- d. evaluation of student progress
- e. record keeping
- f. tuition and/or fees charged, receipt and disbursement of funds, and refund policy
- g. appointment and validation of credentials of faculty teaching the course
- h. nature and location of courses
- i. instructional resources, such as the library

(Additional data needed would include course outlines, syllabi, copies of exams, records of students, and evidence of equivalencies with established programs.)

APPENDIX L

INTERIM GUIDELINES FOR CONTRACTUAL ARRANGEMENTS

In establishing contractual arrangements with non-regionally accredited organizations, institutions are expected to utilize the following guidelines. The not-for-profit institution should establish that its tax exempt status, as governed by state or federal regulations, will not be affected by such contractual arrangements with a for-profit organization.

I. The Contract

A. Should be executed only by duly designated officers of the institution and their counterparts in the contracting organization. While other faculty and administrative representatives will undoubtedly be involved in the contract negotiations, care should be taken to avoid implied or apparent power to execute the contract by unauthorized personnel.

B. Should establish a definite understanding between the institution and contractor regarding the work to be performed, the period of the agreement and the conditions under which any possible renewal or renegotiation of the contract would take place.

C. Should clearly vest the ultimate responsibility for the performance of the necessary control functions for the educational offering with the accredited institution granting credit for the offering. Such performance responsibility by the credit granting institution would minimally consist of adequate provisions for review and approval of work performed in each functional area by the contractor.

D. Should clearly establish the responsibilities of the institution and contractor regarding:

a. indirect costs
b. approval of salaries
c. equipment
d. subcontracts and travel
e. property ownership and accountability
f. inventions and patents
g. publications and copyrights
h. accounting records and audits
i. security
j. termination costs
k. tuition refund
l. student records
m. faculty facilities
n. safety regulations
o. insurance coverage

II. Enrollment Agreement

A. The enrollment agreement should clearly outline the obligations of both the institution and the student, and a copy of the enrollment agreement should be furnished to the student before any payment is made.

B. The institution should determine that each applicant is fully informed as to the nature of the obligation he is entering into and as to his responsibilities and his rights under the enrollment agreement before he signs it.

C. No enrollment agreement should be binding until it has been accepted by the authorities of the institution vested with this responsibility.

III. Tuition Policies

A. Rates

1. The total tuition for any specific given course should be the same for all persons at any given time. Group training contracts showing lower individual rates may be negotiated with business, industrial, or governmental agencies.

2. Tuition charges in courses should be bona fide, effective on specific dates, and applicable to all who enroll thereafter or are presently in school, provided the enrollment agreement so stipulates.

3. All extra charges and costs incidental to training should be revealed to the prospective student before he is enrolled.

4. The institution should show that the total tuition charges for each of its courses is reasonable in the light of the service to be rendered, the equipment to be furnished, and its operating costs.

B. Refunds and Cancellations

1. The institution should have a fair and equitable tuition refund and cancellation policy.

2. The institution should publish its tuition refund and cancellation policy in its catalog or other appropriate literature.

C. Collection Practices

1. Methods used by an institution in requesting or demanding payment should follow sound ethical business practices.

2. If promissory notes or contracts for tuition are sold or discounted to third parties by the institution, enrolees or their financial sponsors should be aware of this action.

IV. Student Recruitment

A. Advertising and Promotional Literature

1. All advertisements and promotional literature used should be truthful and avoid leaving any false, misleading or exaggerated impressions with respect to the school, its personnel, its courses and services, or the occupational opportunities for its graduates..

2. All advertising and promotional literature used should clearly indicate that education, and not employment, is being offered.

3. All advertising and promotional literature should include the correct name of the school. So-called "blind" advertisements are considered misleading and unethical.

B. Field Agents

1. An institution is responsible to its current and prospective students for the representations made by its field representatives (including agencies and other authorized persons or firms soliciting students), and therefore should select each of them with the utmost care, provide them with adequate training, and arrange for proper supervision of their work.

2. It is the responsibility of an institution to conform to the laws and regulations of each of the states in which it operates or solicits students, and in particular to see that each of its field representatives working in any such state is properly licensed or registered as required by the laws of the state.

3. If field representatives are authorized to prepare and/or run advertising, or to use promotional materials, the institution should accept full responsibility for the materials used and should approve any such in advance of their use.

4. When field representatives are authorized to collect money from an applicant for enrollment, they should leave with the applicant a receipt for the money collected and a copy of the enrollment agreement.

5. No field representative should use any title, such as "counselor," "advisor," or "registrar," that tends to indicate that his duties and responsibilities are other than they actually are.

6. No field agent should violate orally any of the standards applicable to advertising and promotional material.

* * * * * * * * *

Note: Questions about these guidelines or requests for further information should be addressed to the office of the institution's regional accrediting commission.

Approved by the Council
March 14, 1973

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